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ARMENIA 2025 Country Report Yerevan





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Not-for-Profit Law



CSO Meter 2025: Armenia Country Report

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The mission of Transparency International Anticorruption Center (TIAC) is to promote good governance in Armenia by reducing corruption and strengthening democracy.

The European Center for Not-for-Profit Law Stichting (ECNL) is a leading European resource and research centre in the field of policies and laws affecting civil society. ECNL creates knowledge, empowers partners and helps set standards that create, protect and expand civic freedoms.

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ABBREVIATIONS & ACRONYMS

AAC	Armenian Apostolic Church
AI	Artificial intelligence
AMD	Armenian Dram
CPFE	Committee to Protect Freedom of Expression
CSO	Civil society organisation
DDoS	Distributed denial-of-service
EaP	Eastern Partnership
ECNL	European Center for Not-for-Profit Law
EU	European Union
EUR	Euro
GDP	Gross domestic product
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex, Asexual, Ally, etc.
LSGB	Local self-government body
MP	Member of parliament
NGO	Non-governmental organisation
NSS	National Security Service
OGP	Open Government Partnership
PDPA	Personal Data Protection Agency
RA	Republic of Armenia
SLAPP	Strategic litigation against public participation
SRC	State Revenue Committee
State Register Agency	Agency for State Register of Legal Entities of the Ministry of Justice
TIAC	Transparency International Anticorruption Center
UBO	Ultimate beneficial owner
UN	United Nations
UNECE	The United Nations Economic Commission for Europe
U.S.	United States of America
USAID	United States Agency for International Development
USD	United States Dollar
VAT	Value-added tax

I. EXECUTIVE SUMMARY

Country context and important trends relevant to the civil society environment

The political environment in Armenia in 2025 was shaped by continued threats to the country by Azerbaijan's political leadership,¹ with negotiations around a peace agreement taking place in parallel. Furthermore, the political landscape was impacted by rising tensions ahead of the 2026 elections, along with the lingering effects of the Nagorno-Karabakh war, which were all happening in the broader context of geopolitical shifts, including shifting foreign policy priorities of the European Union (the EU) and United States of America (the U.S), heightened instability in the Middle East, democracy backsliding in neighbouring Georgia, and the continued war in Ukraine.

In 2025, Armenia took several steps to develop its foreign policy agenda towards strengthening its relations with the EU and the U.S.. In early 2025, following a citizen legislative initiative, the National Assembly adopted the Law on Initiating the Process of Armenia's Accession to the European Union, reflecting the government's political will as well as being a strategic move towards integrating Armenia with the wider EU.² In parallel, based on EU visa liberalisation negotiations, which commenced in September 2024, and following significant progress made by the Armenian government, the Visa Liberalisation Action Plan was handed over by the EU to the Armenian government in early November 2025. This Action Plan highlighted reforms regarding document security, border and migration management, public order and security, including data protection, and external relations and fundamental rights.³ For civil society organisations (CSOs), this move created new opportunities to engage in EU-driven reform processes and policy dialogues, while at the same time placed additional pressure on the government to align policies and legislation with the more

¹ Reuters, "Armenia warns of escalation risk after Azeri leader calls it 'fascist'", 8 January 2025, <https://www.reuters.com/world/asia-pacific/armenia-warns-escalation-risk-after-azeri-leader-calls-it-fascist-2025-01-08/>; Hoori Minoyan, "Aliyev warns Armenia: amend constitution or risk fallout", *Armenian Weekly*, 27 August 2025, <https://armenianweekly.com/2025/08/27/aliyev-warns-armenia-amend-constitution-or-risk-fallout/>.

² CSO Meter, "Armenia: Following a citizen legislative initiative, National Assembly passed a law to initiate EU accession in first reading", 3 March 2025, <https://csometer.info/updates/armenia-following-citizen-legislative-initiative-national-assembly-passed-law-initiate-eu>.

³ EU Neighbours East, "EU and Armenia announce political agreement on partnership agenda", 1 July 2025, <https://euneighbourseast.eu/news/latest-news/eu-and-armenia-announce-political-agreement-on-partnership-agenda>; Armenpress, "'Historic step': EU hands over Armenia Visa Liberalisation Action Plan", 5 November 2025, <https://armenpress.am/en/article/1234129>; EU Migration and Home Affairs, "Action Plan on Visa Liberalisation with Armenia", 5 November 2025, https://home-affairs.ec.europa.eu/action-plan-visa-liberalisation-armenia_en.

demanding European standards. Further, on 2 December 2025, the EU and Armenia adopted a new Strategic Agenda for the EU-Armenia Partnership, building on the EU-Armenia Comprehensive and Enhanced Partnership Agreement (the CEPA), and deepening the political, economic and sectoral cooperation between the two parties.⁴ Along with the U.S.-Armenia Strategic Partnership Charter, signed in January 2025, which strengthened grounds for cooperation with the U.S. in areas such as democracy, human rights and cybersecurity,⁵ these steps underscored Armenia's efforts to diversify its geopolitical affiliations and security partnerships.

On 8 August 2025, Armenia and Azerbaijan signed a US-mediated Joint Declaration, initialising the peace agreement text.⁶ The Declaration included commitments to close the OSCE Minsk Process and to open transport and communication routes on the basis of respect for the sovereignty, territorial integrity and jurisdiction of the two countries, including the provision of unimpeded connectivity between mainland Azerbaijan and Nakhichevan through Armenia under the proposed Trump Route for International Peace and Prosperity (the TRIPP project).⁷ While the pre-signed peace agreement generated cautious optimism for the normalisation of relations between the two nations and enhanced border security, the clause on withdrawing all interstate claims drew serious criticism by a group of human rights organisations. In early 2025, CSOs warned that abandoning cases before international courts would undermine citizens' rights, breach Armenia's international obligations and allow Azerbaijan to evade accountability. CSOs also emphasised that any political settlement of the conflict must be accompanied by mechanisms to ensure justice for any victims.⁸

In May-June 2025, tensions escalated between the government and the Armenian Apostolic Church (AAC). In recent years, some of the leading figures of the AAC have openly aligned themselves with opposing political forces, and repeatedly demanded the resignation of the Prime Minister.⁹ In his statements and online social media posts,

⁴ European Commission, "European Union and Armenia adopt new Strategic Agenda to deepen partnership", 2 December 2025, https://enlargement.ec.europa.eu/news/european-union-and-armenia-adopt-new-strategic-agenda-deepen-partnership-2025-12-02_en

⁵ U.S. Mission Armenia, "Charter on Strategic Partnership Between the United States of America and the Republic of Armenia", 15 January 2025, <https://am.usembassy.gov/charter-on-strategic-partnership-between-the-united-states-of-america-and-the-republic-of-armenia/>.

⁶ Ministry of Foreign Affairs of the Republic of Armenia, "Publication of the initialled Agreement between Armenia and Azerbaijan", 11 August 2025, <https://www.mfa.am/en/press-releases/2025/08/11/Initialled%20Arm-Az%20Peace%20Agreement%20text/13394>

⁷ The Office of the Prime Minister of the Republic of Armenia, "Joint Declaration by the President of the Republic of Azerbaijan, the Prime Minister of the Republic of Armenia and the President of the United States of America on the outcomes of their meeting in Washington D.C., United States of America", 9 August 2025, <https://www.primeminister.am/en/press-release/item/2025/08/09/Nikol-Pashinyan-visit-US-declaration/>

⁸ Protection of Rights Without Borders, Statement by CSOs, 14 January 2025, <https://prwb.am/en/2025/01/14/haytararvo%d6%82thyvo%d6%82n/>

⁹ Andranik Shirinyan, "As the Church and government clash in Armenia, democracy falls victim" *OC Media*, 20 June 2025, <https://oc-media.org/opinion-as-the-church-and-government-clash-in-armenia-democracy-falls-victim/>.

the Prime Minister accused the ACC's church leaders of possessing a lack of integrity and made allegations of corruption towards them.¹⁰ The confrontation between the government and the AAC sparked public outrage, and many citizens, including representatives of some CSOs, criticised the Prime Minister for using obscene language and interfering with the autonomy and internal affairs of the AAC.¹¹ This escalation was accompanied by the revelation of plans of an alleged coup by several religious and political figures, who were arrested by the National Security Service (the NSS) in June 2025. At the same time, the National Assembly stripped the immunity entitlements of three opposition members of parliament (MPs), paving the way for prosecutions which were claimed by their allies as politically motivated.¹²

Public trust towards the government continues to decline. A poll conducted by the International Republican Institute in June-July 2025 found that 49% of respondents believe that Armenia was headed in the "wrong direction", compared to 36% who think it is moving in the right direction, while 61% mentioned that they do not trust any political figure.¹³ This distrust towards state institutions is closely linked with the high level of polarisation and disinformation that persists in Armenian society, along with the high level of hateful rhetoric. For CSOs, this social polarisation and the related political tensions demand careful balancing, as they face a new wave of public pressure and stigmatisation both for voicing criticism and for engaging in collaboration initiatives with government actors.

External funding trends have further deepened the vulnerabilities of Armenian civil society. Cuts in foreign aid, particularly from the U.S., have heavily affected many CSOs. This has forced programme closures and left many organisations having to survive by sharply reducing the scope of their operations, meaning that they are now often unable to cover basic costs such as the rent of office spaces.¹⁴ This funding crisis has underscored the sector's dependence on external support and has highlighted the remaining gaps in financial sustainability. Media organisations were hit especially

¹⁰ Arshaluys Barseghyan, "Pashinyan and wife accuse clergymen of paedophilia and violating celibacy vows" *OC Media*, 30 May 2025, <https://oc-media.org/pashinyan-and-wife-accuse-clergymen-of-paedophilia-and-violating-celibacy-vows/>.

¹¹ Susan Badalian, Tatevik Lazarian, Robert Zargarian, "Pashinian's Profanities Against Armenian Church Spark Outrage", *Azattyun.am*, 30 May 2025, <https://www.azattyun.am/a/33429832.html>; Protection of Rights Without Borders, Statement by CSOs, 29 June 2025 (in Armenian), <https://prwb.am/2025/06/29/haytararvo%d6%82thyvo%d6%82n-2/>.

¹² Yousef Bardouka, "Armenian Parliament waives immunity for 3 MPs, including one accused in coup plot", *OC Media*, 8 July 2025, <https://oc-media.org/armenian-parliament-waives-immunity-for-3-mps-including-one-accused-in-coup-plot/>.

¹³ International Republican Institute, "Public Opinion Survey: Residents of Armenia: June 2025", July 21, 2025, <https://www.iri.org/resources/public-opinion-survey-residents-of-armenia-june-2025/>.

¹⁴ According to preliminary data, about 40% of Armenian CSOs relied on USAID grants for a substantial portion of their budgets, source: Caucasus Watch, "After USAID: Armenian Civil Society at a Crossroads", 14 August 2025, <https://caucasuswatch.de/en/insights/after-usaid-armenian-civil-society-at-a-crossroads.html>.

hard in the first few months of 2025, with shrinking resources undermining the scope of independent journalism, thereby increasing the exposure of media organisations to political pressures and external influences.¹⁵ Despite repeated appeals by CSOs and media organisations for government support, no substantive response was provided by the government. The updated EU Roadmap for Engagement with Civil Society in Armenia underlined the sector's financial sustainability challenges alongside broader political and regional developments. The EU Roadmap also identified key enabling environment constraints and capacity gaps and offered strategic guidance to strengthen the role of CSOs in democratic governance, policy dialogue, and sustainable development.¹⁶

Key developments and priorities in the civil society environment

The overall score for the CSO environment in Armenia **remained unchanged in 2025** as compared to 2024 (4.8 out of 7). The top three areas with the highest scores also remained consistent and include Freedom of Association (5.7), Access to Funding (5.3) and Freedom of Peaceful Assembly (5.2). As was the case in 2024, the areas with the lowest scores are State-CSO Cooperation (4.0) and State Support (4.1), followed by State Duty to Protect (4.5) and Digital Rights (4.4). Three areas – Freedom of Expression, Right to Privacy, and Digital Rights – registered score decreases compared to 2024.

In **Freedom of Expression**, the decrease in the overall area score (4.8 in 2025 from 4.9 in 2024) was a result of practice score decline (4.2 in 2025 from 4.3 in 2024) due to several challenges Armenia faced such as the highly-polarised political climate which was marked by verbal attacks, smear campaigns and occasional physical violence against journalists. High levels of disinformation and hate speech remain a concern, with allegations that law enforcement apply the provisions on hate speech and public calls to incite violence in a disproportionate and selective manner, primarily to protect officials. At the same time, both negative and positive legislative developments were observed in this area, including the establishment of a foundation supporting audiovisual broadcasters and a reduction in the minimal number of public broadcasters. Furthermore, several draft laws were developed which have the aim of updating defamation rules, extending liability to include online content and strengthening the oversight of broadcasters. Meanwhile, the government, in collaboration with CSOs, implemented initiatives to improve media literacy and tackle

¹⁵ Tigran Grigoryan, "The impact of U.S. aid cuts on Armenia's civil society and media", *CivilNet*, 17 March 2025, <https://www.civilnet.am/en/news/822632/the-impact-of-u-s-aid-cuts-on-armenias-civil-society-and-media/>.

¹⁶ The European Union, "EU Roadmap for Engagement with Civil Society in Armenia 2021-2027", updated: June 2025, <https://www.eeas.europa.eu/sites/default/files/2025/documents/EU-CSO%20Roadmap%20Armenia%20UPDATED%20June%202025.pdf>

disinformation under the National Concept of the Struggle against Disinformation and established a Strategic Communication Department in the Prime Minister's Office.

In **Right to Privacy**, privacy breaches and leaked wiretaps highlighted systemic gaps in protecting against unlawful data processing and a lack of effective prevention and accountability mechanisms, leading to lower area scores (from 4.9 in 2024 to 4.8 in 2025). The need for better oversight and accountability mechanisms for surveillance activities also remains a major practical problem. In this context, amendments expanding police access to public surveillance cameras have been viewed as risky. On the positive side, the plans to establish an independent personal data protection authority and a draft package of the Law on Public Information and Law on Cybersecurity, along with amendments to the Law on the Protection of Personal Data, provide a more solid foundation for future improvements in personal data protection.

These legislative reforms are also relevant to **Digital Rights** which provide the possibility of strengthening cybersecurity under the coordination of a new independent body. However, the amendments expanding government access to surveillance systems negatively affected the law score of the area, resulting in a decline of the overall area score (from 4.5 in 2024 to 4.4 in 2025). In practice, the enforcement of safeguards governing surveillance technology remains weak, and CSOs, journalists, and activists continue to face spyware, phishing, and DDoS attacks. At the same time, the government continues to expand the digitalisation of services, media literacy efforts, and internet access, with many CSOs playing a key role in media education and fact-checking.

In **State-CSO Cooperation**, the Law score improved (from 4.3 in 2024 to 4.4 in 2025) due to the establishment of a department on participatory and open governance and the introduction of new regulations aimed at improving public participation and state-CSO cooperation. However, the area score remained the same (overall score 4.0), the lowest of all CSO Meter areas, reflecting the absence of any overarching policy or strategy on CSOs. Amendments to the Law on the Public Council led to the relaunch of this constitutional advisory body after years of inactivity and the initiation of a process aiming to establish a Fact-Finding Commission under its structure. Although there are numerous national and local level consultative bodies and groups, many remain inactive, lack accountability and/or operate irregularly. A new regulation adopted in September 2025 is expected to ensure that public councils meet with regularity, have regional representation and introduce proper feedback mechanisms.

The scores of other areas of the CSO Meter remained unchanged in 2025. Legislation and practice in **Freedom of Association** (overall area score 5.7) are generally supportive of CSOs, with sample registration documents allowing public organisations to register more quickly. The lack of online registration for CSOs and the administrative

and financial burdens associated with the disclosure requirements for their ultimate beneficial owners (UBOs) remain the main challenges in this area.

In **Equal Treatment** (overall area score 4.9), the key challenges are that there are more favourable conditions for businesses compared to CSOs in the registration and taxation of economic activities and there is selective engagement of CSOs by decision makers. Although the legislation provides opportunities for CSOs to seek funding from various sources, a major issue of **Access to Funding** (overall area score 5.3) remains the lack of incentives for funding diversification, which is exacerbated by a significant reduction of donor support in 2025. Moreover, the interpretation of grant projects as “service delivery” which is subject to charging VAT remains a persistent concern.

In **Freedom of Peaceful Assembly** (overall area score 5.2), the Law on Police Guards and new by-law standards introduced clearer rules regarding the use of force and required police training, which might potentially improve the policing of assemblies. Fewer large assemblies occurred in 2025, and most were unhindered. However, policing was often excessive relative to the number of protesters. At the same time, weak accountability for past violations by police against protesters continues to raise concerns.

In **Right to Participation in Decision-Making** (overall area score 4.9), positive developments include the establishment of a dedicated government department and new regulations to strengthen participation frameworks. However, the lack of institutional mechanisms for participation in the early stages of decision-making and for engagement with the National Assembly, as well as continuing problems with access to information remain the most significant challenges. The draft Law on Public Information, pending parliament approval, could expand the disclosure of information and improve open data availability, though practical challenges remain substantial.

The continuing lack of effective protection for CSOs working in sensitive areas and pressure on environmental activists through strategic litigation against public participation (SLAPPs), are the main challenges in **State Duty to Protect** (overall area score 4.5). The progress on extending the right of a public organisation to represent public interests in the court remains limited.

Finally, in **State Support** (overall area score 4.1) the key challenges remain unchanged from previous years, with the most significant gap being the absence of an encouraging tax environment for both CSOs and donors. A case of a secret funding allocation raised new concerns on state funding fairness and transparency, while local level support remains largely discretionary. The modernised electronic platform for state procurements, which will cover the administration of state grants, is still a work in progress.

Key developments

In 2025, the following key developments in the CSO Meter areas were reported:

- The termination of U.S. foreign assistance programs had a drastic impact on Armenia's civil society, forcing many CSOs to scale back operations, while, at the same time, no fiscal relief or tax incentives were introduced by the government. These challenges parallel efforts to diversify income through crowdfunding, which yielded limited results. Similarly, the lack of a legal framework for social entrepreneurship and unequal competition with private companies in the market constrains the ability of to engage in economic activities and in efforts to ensure self-sustainability.
- The Department of Participatory and Open Government Issues within the Prime Minister's Office was established. This is tasked with developing and overseeing participatory governance methodologies, coordinating open government initiatives and enhancing cooperation with CSOs.
- The Prime Minister's decision to approve new regulations regarding public councils attached to ministers and heads of government-affiliated bodies regulates the selection of council members and requires that all draft strategies, concepts and programmes developed by ministries and other bodies must be discussed with council members both at the initial concept stage and after the development of the draft legal act.
- Media and journalists are increasingly targeted by various political forces and there is also a trend of stigmatising independent CSOs and activists for their critical opinions and statements. Generally, the hostile and polarised environment, together with a limited culture of open and respectful debate, has had an increasingly chilling effect on the freedom of expression in 2025.
- Multiple cases of unlawful surveillance and leaked intimate video or wiretap recordings, including a high-profile October 2025 incident involving the publication of intimate recordings that were obtained as a result of video surveillance inside a private apartment, exposed systemic gaps in privacy protection and fuelled concerns about possible state-linked leaks and politically motivated misuse of surveillance tools.
- In August 2025, the government approved a legislative package which included new laws on Public Information, Cybersecurity and the Regulatory Body of Information Systems, along with amendments to related draft laws, and in October 2025 the National Assembly voted for the legislative package in the first

reading.¹⁷ Among other purposes, this legislative package is designed to strengthen the rules on data management by public bodies and regulate access to public information, improve cybersecurity measures and establish an autonomous body to monitor compliance.

- Amendments to the Law on Police, adopted in March 2025, grant access to the Ministry of Internal Affairs to cameras installed on public buildings, transportation, airports, border checkpoints and parking areas. The amended law authorises the identification of individuals in case of “*reasonable suspicion of a crime or an administrative offence*”, and includes several safeguards to ensure the transparent and accountable use of surveillance systems, such as electronic logging, timestamping, use by designated personnel and liability for breaches. The amendments also provide the possibility for municipality administrations to access police’s surveillance systems in their communities.
- Amendments to the Law on the Public Council led to the relaunch of the activities of the Public Council – a constitutional advisory body to the government, set to represent public interests in policymaking – which had been inactive in recent years. These amendments, among other provisions, envisaged the establishment of a Fact-Finding Commission to investigate unresolved fundamental and systemic human rights violations through 1991-2023. The new composition of the Public Council was fully formed in April 2025 and convened several meetings through 2025, while the establishment of the Fact-Finding Commission is underway.

Key priorities

In 2025, there were limited advances in addressing the recommendations of the 2024 CSO Meter report. Recommendations on the improvement of participation mechanisms and the engagement of CSOs in the early stages of policy making were partly addressed due to the new governmental regulations and the establishment of an institutional unit focused on issues of participatory and open governance. The ongoing legislative drafts pending parliamentary approval provide grounds for expecting better results in terms of cybersecurity and access to information. However, the challenges related to weak financial sustainability of CSOs were even amplified due to negative trends in the global funding ecosystem, while practical issues related to violations in the freedom of speech and the right to privacy have raised significant concerns and negatively affected scores in these areas. As a result, to improve the CSO environment in the coming period, the government and the relevant institutions, together with CSOs and all other affected stakeholders, should prioritise the following seven

¹⁷ Note: The legislative package was fully adopted by the parliament on 4 December 2025 (after the CSO Meter 2025 reporting period).

recommendations from a total number of 38 recommendations in the eleven CSO Meter areas (four of these recommendations remain from 2024):

1. The Ministry of Finance provides a definition of “grant” in accordance with the best international practices and following consultation with CSOs and does not treat grant projects or other non-profit activities as economic activities;
2. The government (particularly the Ministry of Finance) and the National Assembly create a more favourable tax environment to improve the possibilities for CSOs to seek funding and in-kind support from diverse sources, including individual and business donations and direct entrepreneurship activities;
3. The National Assembly establishes mechanisms for mandatory public consultations on draft legislation produced by members of the National Assembly and for CSO engagement in both the early stages of legal drafts and during the final revisions of the drafts received by the government (including through engagement at the level of Standing Committees);
4. State bodies utilise and expand the pre-existing and new institutional mechanisms of participation to ensure meaningful participation, including through: (a) engaging CSOs in the early stages of policy development; (b) addressing the drawbacks of the e-draft platform and providing statistics on participation activities and the incorporation of comments on this platform; (c) providing sufficient time for consultations and organising more frequent face-to-face consultations, including in the regions; and (d) considering and incorporating well-founded and evidence-based suggestions to the maximum possible extent;
5. The government and public officials uphold freedom of expression standards, promote a culture of open and respectful public dialogue, and ensure responsible communication toward the media, refraining from intolerance towards diverse or critical opinions as well as from statements that may incite hostility or undermine public trust in journalists and media;
6. The government introduces stronger safeguards against unlawful surveillance and breaches of privacy, ensuring independent oversight and transparent investigations of violations; and
7. The state provides adequate protection for CSOs, including through: (a) adopting anti-discrimination laws and establishing an anti-discrimination body; (b) taking legislative and practical measures against SLAPPs in line with the Council of Europe’s recommendations adopted in April 2024; (c) issuing public statements in support of CSOs that are targeted by third parties; and (d) ensuring proper investigation of attacks against CSOs and activists within a reasonable timeframe.

II. ARMENIA – IN NUMBERS

Population: 3,080,300 (as of 1 January 2025)¹⁸ | GDP per capita: 8,500.6 USD (2024)¹⁹ | Number of CSOs: 7,148 public organisations; 1,854 foundations²⁰ | CSOs per 10,000 inhabitants: 29.2 | Registration fee for a CSO: 10,000 AMD (about 23 EUR)²¹ | Freedom in the World 2025: 54/100 (Partly Free)²² | World Press Freedom Index 2025: 73.96 (34th out of 180 countries).²³



Country score: 4.8

Legislation: 5.2

Practice: 4.3

The scores range from 1 to 7, where 1 signifies the lowest possible score (extremely unfavourable – authoritarian – environment) and 7 signifies the highest possible score (extremely favourable environment).

Areas	Overall	Legislation	Practice
Freedom of Association	5.7	5.8	5.6
Equal Treatment	4.9	5.0	4.8
Access to Funding	5.3	5.8	4.8
Freedom of Peaceful Assembly	5.2	5.7	4.7
Right to Participation in Decision-Making	4.9	5.4	4.3
Freedom of Expression	4.7 ↓	5.2	4.2 ↓
Right to Privacy	4.8 ↓	5.7 ↓	3.8 ↓
State Duty to Protect	4.5	5.2	3.8
State Support	4.1	4.3	3.9
State-CSO Cooperation	4.0	4.4 ↑	3.6
Digital Rights	4.4 ↓	4.8 ↓	4.0

The arrows indicate improvement or deterioration compared to last year's scores.

¹⁸ Statistical Committee of the Republic of Armenia, "Time Series", <https://armstat.am/en/?nid=12&id=11001>.

¹⁹ The World Bank, "GDP per capita – Armenia", <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=AM>.

²⁰ The numbers were provided as of 31 August 2025 by the State Register of Legal Persons of the Ministry of Justice on 9 September 2025 in response to an enquiry from TIAC.

²¹ Electronic Register of the Government of the Republic of Armenia, "Required documents, fees and timelines of state registration" (in Armenian), <https://www.e-register.am/am/docs/49>.

²² Freedom House, "Freedom in the World 2025, Countries and Territories", <https://freedomhouse.org/countries/freedom-world/scores>.

²³ 2025 World Press Freedom Index, "Reporters Without Borders", <https://rsf.org/en/index>.

III. FINDINGS

3.1 Freedom of Association

Overall score per area: **5.7/7**

Legislation: **5.8/7**

Practice: **5.6/7**

Freedom of association is guaranteed by legislation in Armenia. CSOs (i.e. public organisations and foundations) do not face significant difficulties during their registration and operation. There is no requirement to register as a legal person for civic initiatives and no limitations on associating online. The registration procedure is simple and inexpensive. The sample registration documents that are set by the government allow public organisations to register quickly but provide only one type of governance structure and one type of membership regulations. CSOs do not yet have the possibility to register online in contrast to most types of business entities. Due to bureaucratic and financial issues, CSOs that no longer operate are reluctant to engage in the process to dissolve themselves.

Public organisations and foundations are required to submit annual reports on their budgets and activities. Sanctions are set by law and applied by the State Revenue Committee (SRC) for CSOs that fail to comply with these requirements. Following receipt of the reports from CSOs, the SRC publishes them online in PDF format. The requirement for all legal entities to declare their UBOs brings additional costs to amend relevant data.

The scores in the area of Freedom of Association remained the same as in 2024. The new platform of the State Register is under development and the ability to register online is expected soon. As of now, however, the recommendation from the previous CSO Meter report that CSOs have the option to register online remains in place, along with the recommendation to allow greater flexibility in the template charter used for the registration process and to modernise the annual reporting platform.

Standard I: Everyone can freely establish, join, or participate in a CSO.

In Armenia, the law allows everyone to establish, join or participate in a CSO. The Constitution includes a provision on freedom of association, which may be restricted only by laws aimed at state security, protecting public order, health and morals or the basic rights and freedoms of others.²⁴ According to the Civil Code, non-profit organisations include public associations and foundations, while public associations can register as public organisations, religious organisations, political parties or trade

²⁴ Constitution of the Republic of Armenia ("RA"), 5 July 1995, amended on 6 December 2015, Article 45 (in Armenian), <https://www.arlis.am/hy/acts/102510>.

unions. For the purposes of this report, “*registered CSOs*” refers to public organisations and foundations in Armenia.

A public organisation can be founded by two or more individuals and/or legal persons. Organisations such as political parties, religious organisations, or trade unions cannot be founders or members of a public organisation,²⁵ as there are other types of public associations for these entities. Foundations can be established by one or more individuals and/or legal persons.²⁶ Although the religious organisations and political parties are able to establish foundations, and no issues have been raised in practice with regards to the ban on founding public organisations, this provision is not in line with international standards.²⁷

The relevant legislation does not impose any restrictions on the residency, nationality, or citizenship of founders of either foundations or public organisations. Judges cannot engage in the paid positions or executive management of non-profit organisations.²⁸ Individuals and organisations can also freely associate both in person and online without a need for formal registration.

In practice, there are no obstacles in establishing or registering an organisation, joining a CSO, or taking part in its activities. The registration procedure includes the mostly formal checking of compliance with the legal requirements.

Standard II: The procedure to register a CSO as a legal entity is clear, simple, quick and inexpensive.

The CSO registration procedure established by law is simple, quick and inexpensive. The Agency for State Register of Legal Entities of the Ministry of Justice (the State Register Agency) is responsible for the registration of legal entities in Armenia. The state fee for the registration of CSOs is 10,000 AMD (around 23 EUR). The timeline for registration is up to ten working days. The registration of a public organisation takes two working days in cases where the founders have used a sample charter and other documents.²⁹ The fee for registering changes in the charter and other information subject to registration is 10,000 AMD (around 23 EUR), while the fee for changing the data regarding an executive of a CSO is 5,000 AMD (around 11 EUR).³⁰ Online

²⁵ RA Law on Public Organisations, 16 December 2016, last amended as of 13 October 2023, Article 10 (in Armenian), <https://www.arlis.am/hy/acts/183139>.

²⁶ RA Law on Foundations, 26 December 2002, last amended as of 20 October 2025, Article 12 (in Armenian), <https://www.arlis.am/hy/acts/214356>.

²⁷ European Convention on Human Rights, 4 November 1950, Article 11, https://www.echr.coe.int/documents/d/echr/convention_ENG; OSCE Office for Democratic Institutions and Human Rights (“ODIHR”), “Guidelines on the Legal Personality of Religious or Belief Communities”, OSCE/ODIHR, 2014, <https://www.osce.org/files/f/documents/9/9/139046.pdf>.

²⁸ RA Judicial Code, 7 February 2018, last amended as of 21 November 2024, Article 5 (in Armenian), <https://www.arlis.am/hy/acts/199816>.

²⁹ RA Law on Public Organisations, 16 December 2016, Article 14.

³⁰ RA Law on State Duty, 27 December 1997, last amended as of 1 September 2025, Article 16 (in Armenian), <https://www.arlis.am/hy/acts/211026>.

registration is not yet available for CSOs but is expected to be launched at the end of 2025 by the Ministry of Justice along with the new electronic platform of the State Register.³¹

The list of documents required for registration is defined by law and published on the website of the State Register Agency.³² Registration can be denied if the procedure for establishing the CSO is not followed, the necessary documents are not submitted or are not compliant with the law, or if the organisation's proposed name is not compliant with the legal requirements.³³ In particular, the law requires CSOs to mention the area of their activities in their name,³⁴ and does not allow the use of the name of an existing organisation, including those dissolved within the preceding year.³⁵

In practice, there are no reported cases of any CSOs not being able to register. According to information provided by the State Register Agency, in January–August 2025 there were two cases of rejection out of 322 applications for registration of a new CSO, with the possibility for applicants to re-apply once the required corrections are made to the application package.³⁶ CSOs note that the staff of the State Register Agency are responsive and collaborative, provide timely feedback and consult, where necessary, on the corrections to be made in the applicant's charter and other registration documents so that there is no cause for rejection.³⁷ CSO founders and representatives are required to travel to the capital Yerevan or to the provincial centres for registration of a new organisation or for changes to a CSO's documents. This creates additional logistical difficulties and expenses for the organisations based in remote settlements.

The legislation provides flexibility for CSOs to define their governance structure, membership criteria and other regulations of the charter. The sample documents provided by the government facilitate the process of preparing the registration package and allow applicants to register quickly. However, the sample charter provides only one type of governance structure and membership regulations, and there are no alternative sample templates for other governance structures (e.g. a sample template incorporating a board in the governance structure) that would also allow CSOs to register within shorter timeframes.³⁸ Therefore, in practice, experts note that the CSOs tend to use

³¹ Information check with the representative of the State Register Agency, October 2025.

³² Electronic Register of the Government of the Republic of Armenia, "Required documents, fees and timelines of state registration", *op. cit.*

³³ RA Law on State Registration of Legal Entities, Separate Subdivisions of Legal Entities, Institutions and Private Entrepreneurs, 3 April 2001, last amended as of 1 August 2025, Article 36 (in Armenian), <https://www.arlis.am/hy/acts/210005>.

³⁴ RA Civil Code, 5 May 1998, last amended as of 8 August 2025, Article 58 (in Armenian), <https://www.arlis.am/hy/acts/210215>.

³⁵ RA Law on Public Organisations, 16 December 2016, Article 6; RA Law on Foundations, 26 December 2002, Article 5.

³⁶ Information provided by the State Register Agency on 9 September 2025 in response to an enquiry by TIAC.

³⁷ Interviews and focus group discussions conducted in the framework of CSO Meter research, August–September 2025.

³⁸ Electronic Register of the Government of the Republic of Armenia, "Template documents for public organisations", <https://www.e-register.am/am/docs/364>.

standardised provisions instead of specifying their own governance structures and management procedures just to keep in line with the sample template and not create additional difficulties as they go through the registration process.³⁹

The voluntary dissolution of CSOs implies several bureaucratic and financial challenges. The fee for starting the process of formal dissolution is 20,000 AMD (around 46 EUR) and several documents from various agencies must be collected for the dissolution process. In practice therefore, to avoid the related costs and paperwork, many CSOs that no longer operate do not engage in the formal dissolution process. As a result, the current number and list of registered organisations does not reflect the true picture of active CSOs. Therefore, this creates additional difficulties for conducting research and development programmes in the sector.

Standard III: CSOs are free to determine their objectives and activities and operate both within and outside the country in which they were established.

According to the law, CSOs are free to determine their objectives and there are no restrictions in their area of operation. Public organisations define their objectives in their charter, and these must not repeat the objectives of other types of associations (such as religious organisations, trade unions or political parties).⁴⁰ The legal definition of “*foundation*” includes an indication of pursuing “*social, charitable, cultural, educational, scientific, health, environmental and (or) other charitable purposes*”.⁴¹

The Law on Public Organisations states that these organisations can become a member of international and foreign non-profit organisations, engage in international relations and establish subdivisions in other countries.⁴² The Law on Foundations also sets out the right for foundations’ membership of international and foreign non-governmental organisations (NGOs).⁴³

There are no practical obstacles imposed by the state that hinder a CSO’s ability to engage in legally allowed areas of operation.

Standard IV: Any sanctions imposed are clear and consistent with the principle of proportionality and are the least intrusive means to achieve the desired objective.

Gradual sanctions are set by law for CSOs that fail to comply with legal requirements, including suspension from the register for gross violations. However, some of the grounds for sanctions lack clarity.

³⁹ Interviews conducted in the framework of CSO Meter research, August-September 2025.

⁴⁰ RA Law on Public Organisations, 16 December 2016, Article 3.

⁴¹ RA Law on Foundations, 26 December 2002, Article 3.

⁴² RA Law on Public Organisations, 16 December 2016, Article 28.

⁴³ RA Law on Foundations, 26 December 2002, Article 18.

Registered CSOs can be subject to administrative liability if they fail to submit an annual activity report as required by law,⁴⁴ as well as when carrying out activities that are not in line with the goals specified in their charters.⁴⁵ The law lacks specificity as to what can be considered as non-compliance. The body authorised for CSO oversight and application of sanctions is the SRC. Penalties for violations are applied in stages with 30-day intervals and include, in the first instance, a warning to the organisation's head, secondly, a fine of 50,000 AMD (around 114 EUR), and, lastly, a fine of 200,000 AMD (around 455 EUR).⁴⁶ The grounds for suspension from the register of a public organisation include a substantial or gross breach of the law during the foundation or operation of the organisation. If these grounds are not removed within one year, the organisation is subject to dissolution. In addition, the grounds for involuntary dissolution include activities aimed at overthrowing constitutional order, the incitement of hatred, or preaching violence or war.⁴⁷ In such cases, the decision on dissolution is made by the court on the basis of a properly justified request by the authorised body. The grounds for involuntary dissolution of foundations include: multiple, substantial or gross violations or fraud during their operation or establishment; insufficiency of a foundation's resources for its operations; non-compliance with its charter goals; the impossibility of achieving its stated charter goals; endangering state security or public safety, public order, public health and morals; or endangering the rights and liberties of others.⁴⁸ The dissolution of foundations, whether voluntary or involuntary, can take place only following a decision by the court, which, as with any court decision, can be appealed through the courts of appeal up to the Court of Cassation of Armenia.

According to the SRC, in January-August 2025, the SRC presented warnings to 635 public organisations and 168 foundations on the grounds of not providing or providing incomplete reports for 2024, and issued fines of 50,000 AMD (around 114 EUR) to 17 public organisations that did not complete the requirements within the timeline set out in the warning notice. At the same time, in January-August 2025, the Committee filed 13 applications to the court to suspend public organisations activities on the ground of not fulfilling reporting requirements for the previous years. No sanction was applied to a public organisation for activities contradicting its charter goals.⁴⁹ There were 23 cases of state registration of CSO dissolution based on CSOs' applications in January-August

⁴⁴ According to the Law on Public Organisations (Article 24), public organisations must publish annual activity reports on their personal page of the electronic reporting system, as well as on their official website (if available), by 30 May of the year following the reporting year. According to the Law on Foundations (Article 39), foundations must publish annual activity reports on their personal page of the electronic reporting system by 1 July of the year following the reporting year.

⁴⁵ RA Code on Administrative Offences, 6 December 1985, last amended as of 1 September 2025, Articles 169.18, 169.26, 169.27 (in Armenian), <https://www.arlis.am/hy/acts/211145>.

⁴⁶ RA Code on Administrative Offences, 6 December 1985.

⁴⁷ RA Law on Public Organisations, 16 December 2016, Article 32.

⁴⁸ RA Law on Foundations, 26 December 2002, Article 34.

⁴⁹ Information provided on 18 September 2025 by the State Revenue Committee in response to an inquiry by TIAC.

2025, and three cases of the dissolution of foundations, following court decisions as required by law.⁵⁰

Registered CSOs are subject to reporting their UBOs.⁵¹ The sanctions for failure to report or non-compliance with the reporting procedures range from fines of 30,000–100,000 AMD (around 68 to 228 EUR)⁵² up to the involuntary dissolution of the CSO by court decision in cases of non-declaration for over three years (see also Area 8: State Duty to Protect).⁵³ Making the first report regarding UBOs is free of charge and mandatory for all organisations, while the fee for registration of any change in this information is 10,000 AMD (around 23 EUR).⁵⁴ Based on information from the State Register Agency, in 2025, warnings were issued to 65 public organisations and 42 foundations for not submitting a declaration on their UBOs, in contrast to the previous year, when only one foundation received a warning for not submitting this declaration.⁵⁵

Standard V: The state does not interfere in the internal affairs and operation of CSOs.

The law prohibits state bodies and local self-government bodies (LSGBs) and/or officials from interfering or obstructing the legitimate activities of public organisations.⁵⁶ For foundations, officials might be involved in governing bodies in cases where the foundation is established via the decision of the government or an LSGB.⁵⁷

The authorised body responsible for the oversight of the compliance of public organisations and foundations regarding the relevant legal requirements is the Department for Non-Profit Organisations' Oversight of the SRC. Its functions include: raising awareness of non-profit organisations; receiving reports and other documents prescribed by law; reviewing these documents; and assessing their compliance with the law. Based on the results of the assessments of compliance with the law, the Department can initiate administrative proceedings, provide recommendations on the removal of violations, and initiate the suspension or dissolution of an organisation through a court application.⁵⁸ The Department does not have powers to organise on-site inspections, and its monitoring functions are limited to the review of documentation.

⁵⁰ Information provided by the State Register Agency on 9 September 2025 in response to an enquiry by TIAC.

⁵¹ Ministry of Justice of the Republic of Armenia, "Circle of persons submitting real beneficiary declarations has been expanded – Who needs to submit a declaration and in what time period?", 11 October 2021, <https://www.moj.am/en/article/2982>.

⁵² RA Code on Administrative Offences, 6 December 1985, Article 169.29.

⁵³ RA Law on State Registration of Legal Entities, Separate Subdivisions of Legal Entities, Institutions and Private Entrepreneurs, 3 April 2001, Article 60.5.

⁵⁴ RA Law on State Duty, 27 December 1997, Article 16.

⁵⁵ Information provided by the State Register Agency on 9 September 2025 in response to an enquiry by TIAC.

⁵⁶ RA Law on Public Organisations, 16 December 2016, Article 9.

⁵⁷ RA Law on Foundations, 26 December 2002, Articles 10 and 12.

⁵⁸ Charter of the Department for Non-Profit Organisations' Oversight adopted by the Order No. 137-L of the Chair of RA State Revenue Committee, 4 March 2019, https://www.src.am/storage/workers/charter/hr_hhpekn_2019_137_L_6423f78426d05.pdf.

Both public organisations and foundations publish annual reports on their activities and budgets via an electronic reporting platform. The reports are published on the website of the SRC in PDF format.⁶⁰ As of 31 August 2025, 2,767 public organisations and 1,025 foundations provided annual reports for 2024.⁶¹ In practice, the reporting requirements are considered to be simple and not burdensome.⁶² The reporting database of the SRC website has limited search filters and lacks an open data format. There was no evidence of inspections of CSOs being carried out in 2025. Tax inspections of CSOs are usually rare: based on information from previous years, such inspections cover mostly state-funded organisations or educational establishments (i.e. universities) and are based on the respective legal regulations.

Specific recommendations in this Area are as follows:

- The State Register Agency revises the standard template charter for registration purposes or provides several templates to allow options for specific features (e.g. governance structures, membership fees, etc.);
- The Ministry of Justice provides the opportunity for CSOs to register and update their registration data online;
- The SRC modernises the electronic database of CSO reports, providing search and filter functions for various criteria, machine-processed, reusable and comparable data based on open data principles.⁵⁹

3.2 Equal Treatment

Overall score per area: **4.9/7**

Legislation: **5.0/7**

Practice: **4.8/7**

The treatment of CSOs by the state both overall and in comparison to business entities has not changed since 2024. Specific aspects of the laws related to registration and taxation are more favourable for the business sector, although, in practice, CSOs are significantly less likely to be subject to tax inspections than businesses. Legal regulations provide equal treatment for all CSOs. However, a

⁵⁹ See more information at: Open Data Charter, “Open Data Charter Principles”, <https://opendatacharter.org/principles/>.

⁶⁰ State Revenue Committee of the Republic of Armenia, “Reports of non-profit organisations”, <https://www.src.am/am/organizationReportsPage/137>.

⁶¹ Information provided on 18 September 2025 by the State Revenue Committee in response to an inquiry by TIAC; the number shows an increase compared to 2,422 public organisations and 950 foundations that provided annual reports for 2023 by 31 August 2024.

⁶² Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

selective approach has been observed in terms of the engagement of CSOs in decision-making.

The scores in the area of Equal Treatment remained the same as in 2024. As in the previous reporting period, the government is recommended to take measures to provide equitable treatment towards CSOs in relation to business entities, since companies are able to register online and free of charge using standard registration forms.

Standard I: The state treats all CSOs equitably with business entities.

Some aspects of the laws on registration and taxation are less favourable for CSOs in comparison to business entities. In particular, the registration process for business entities is less expensive and quicker compared to that of CSOs. The timeline set for the registration of a business is a maximum of two days, in contrast to ten days for the registration of foundations and public organisations (except for cases in which a public organisation is registered in two days based on a standard charter). This difference is conditioned by the need to review a CSO's charter in detail in cases where it is not based on the standard template provided by the state. The state fee for CSO registration is 10,000 AMD (around 23 EUR), while companies do not pay registration fees, and individual entrepreneurs pay 3,000 AMD (around 7 EUR). Moreover, in contrast to CSOs and other types of legal entities, limited liability companies and individual entrepreneurs can register online. In this case, no state fee is charged for registering an individual entrepreneur.⁶³

When carrying out entrepreneurial activities, CSOs cannot make use of the simplified taxation schemes, such as the turnover tax or microenterprise tax regimes. The microenterprise tax regime is provided for business entities with an annual turnover of less than 24 million AMD (around 54,600 EUR) and that carry out a restricted list of activities. It exempts the entity from all state taxes (excluding customs duty, excise fees and fixed income tax for employees).⁶⁴ The turnover tax applies to companies with a turnover of less than 115 million AMD (around 261,800 EUR).⁶⁵ If CSOs were able to use the turnover tax regime, it would allow them to pay tax on ten percent of their gross income instead of a profit tax equal to eighteen percent of their net income.⁶⁶ However, since CSOs generally do not generate profit, as a rule, they are not subject to a payment of profit tax. On the other hand, tax inspections are rare for CSOs compared to business entities.⁶⁷

⁶³ Electronic Register of the Government of the Republic of Armenia, "Required documents, fees and timelines of state registration", *op. cit.*

⁶⁴ RA Tax Code, 4 October 2016, last amended as of 2 August 2025, Articles 267 and 269 (in Armenian), <https://www.arlis.am/hy/acts/210052>.

⁶⁵ *Id.*, Article 254.

⁶⁶ *Id.*, Article 125.

⁶⁷ **Note:** The information is based on the data from previous years and feedback from focus-group participants. Based on the amendments to the Tax Code adopted in 2024, the annual inspection plan are not published starting mid-2024, thus the information on specific number of inspected businesses and CSOs is not available. see: RA Law on Amendments to the RA Tax Code, 22 May 2024 (in Armenian), <https://www.arlis.am/hy/acts/193377>.

Unlike companies, public organisations are obligated to provide an audit report in instances where their annual income from the public budget exceeds 10 million AMD (around 22,800 EUR). This adds to the costs of CSOs when applying for public procurement tenders. In practice, there are very limited cases in which CSOs have obtained public procurements. These limited examples include training or consulting contracts where the CSO has specific expertise in the relevant field.⁶⁸

Both CSOs and businesses are allowed by law to receive funding from any contributors, including from abroad.

Standard II: The state treats all CSOs equally with regard to their establishment, registration and activities.

There are no specific differentiations between different CSOs set by law. The regulations applicable to public organisations and foundations set out the same registration timelines and similar reporting requirements for both types of organisations. The requirement to provide an annual audit report is set for all foundations in cases where the balance-sheet (book) value of their assets exceeds 10 million AMD (around 22,800 EUR) by the end of the reporting year.⁶⁹ For public organisations, the audit report is required only for the expenditure of funds received from the state or from LSGBs in cases where the cumulative amount of these funds exceeds 10 million AMD (around 22,800 EUR) in the reporting year.⁷⁰

In practice, CSOs report that officials apply a selective approach to the CSOs that they consult with, based on the critical stance of organisations and their representatives (see more in Area 5: Right to Participation in Decision-Making).⁷¹

Specific recommendations in this Area are as follows:

- The Ministry of Justice provides opportunities for CSOs to register and update their registration data online as is the case for companies; and
- The Ministry of Justice dismisses registration fees for CSOs that are registered using standard documentation (as is the case for companies).

⁶⁸ Based on data provided on 23 October 2025 by the Ministry of Finance in response to an inquiry by TIAC.

⁶⁹ RA Law on Foundations, 26 December 2002, Article 39.

⁷⁰ RA Law on Public Organisations, 16 December 2016, Article 26.

⁷¹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

3.3 Access to Funding

Overall score per area: **5.3/7**

Legislation: **5.8/7**

Practice: **4.8/7**

Armenian legislation allows CSOs to seek, receive and use funding from all legitimate sources, including international donors. However, this right is not fully exercised in practice, due to the lack of domestic measures and incentives for CSOs to fundraise in their communities and undertake entrepreneurial activities, leaving most organisations to rely predominantly on donor funding. Also, the 2025 cuts in foreign assistance, particularly from the U.S., led to programme closures and downsizing of CSOs' operations, particularly those working in human rights, watchdog activities, election observation and in the media.

As in previous years, audit requirements set by law continue to burden organisations that do not have free (unrestricted) funds for covering audit costs. Potential treatment of grant projects as service provisions and the resulting requirement of charging VAT on grant funding in cases where annual turnover exceeds the threshold set by law continues to raise concerns among CSOs, and risks limiting access to funding in practice for CSOs.

The scores in the area of Access to Funding remain the same as in 2024. The recommendations to define the terminology of grants, provide a more favourable taxation environment to CSOs and to address issues related to the mandatory audit requirement, are therefore still applicable.

Standard I: CSOs are free to seek, receive, and use financial and material resources for the pursuit of their objectives.

Armenian legislation allows CSOs to freely seek, receive and use financial and material resources for their work. The possible sources of the income for organisations are mentioned in the Law on Public Organisations and the Law on Foundations. CSOs can collect membership fees, conduct entrepreneurial activities, receive funds from the state budget, grants, donations and other means that are not prohibited by law.⁷² Endowment funds are also mentioned in the Law on Foundations as a possible source of funding, which should be specified in the foundation's charter along with other provisions on the management and oversight of these funds.

The law sets out audit procedures that affect the ability of CSOs to use and report public funding (see more details in Area 2: Equal Treatment). Audit implementation is problematic for CSOs as it creates additional financial costs and puts them in a less competitive position when applying for state procurement tenders.

⁷² RA Law Public Organisations, 16 December 2016, Article 7; Armenia, RA Law on Foundations, 26 December 2002, Article 8.

In instances where the annual turnover of the organisation exceeds 115 million AMD (around 261,800 EUR), non-profit organisations automatically become twenty percent VAT payers and have to charge VAT on the amount exceeding the threshold.⁷³ In cases in which CSOs have exceeded this threshold (regardless of whether their source of income is grants, donations or revenues from economic activities), they have to charge and pay VAT on their goods, work and services. According to the Tax Code, the goods, work and services covered by grant funding are also subject to VAT, though exemptions can be provided by a relevant government decision.⁷⁴ There is no definition of a “grant” in the Tax Code, while the use of this term is inconsistent in Armenian legislation, allowing for diverse interpretations.⁷⁵ CSOs have concerns that the VAT requirement may pose risks for organisations with income beyond the threshold and relying on grant funding, especially if their programmes do not meet the criteria of granting charitable status. This means that organisations may be required to pay VAT on their grant funding above the threshold in the current year and become mandatory VAT payers for all taxable income starting the following year. CSOs stress that inconsistencies in legislation and the imposition of VAT on grant funding pose a serious threat to the sector’s sustainability and access to resources. To attempt to mitigate these concerns, some organisations avoid attracting additional funding to stay below the threshold. However, those exceeding the threshold may face discretionary checks and fines if their grant projects are classified as service provisions under current legislation.⁷⁶ Despite a number of meetings and discussions with the government since 2023, as well as several letters and appeals by CSOs requesting that the government address this issue in accordance with international practice, no governmental solution has been offered.⁷⁷ Furthermore, although draft amendments to the Law on Procurement published by the Ministry of Finance in November 2025 introduce a definition of “grant”, this definition creates more uncertainty rather than addressing the issue. It mirrors the current definition used in the state grant procedure with an added requirement that a grant must not involve “*acceptance of deliverable results by the customer*”,⁷⁸ a concept that lies at the core of disputes around the Tax Code, as tax authorities often interpret donor reporting as evidence of service delivery.

Donations to CSOs by individuals and companies are not encouraged by the tax environment as a potentially important source of funding. The existing benefits for

⁷³ RA Tax Code, 4 October 2016, Articles 59 and 63.

⁷⁴ *Id.*, Articles 4 and 64.

⁷⁵ See more information at: CSO Meter, “Armenia: Treatment of grant projects as economic activity threatens CSOs’ access to funding”, 11 December 2023, <https://csometer.info/updates/armenia-treatment-grant-projects-economic-activity-threatens-csos-access-funding>.

⁷⁶ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

⁷⁷ Interviews conducted in the framework of CSO Meter research, August-September 2025.

⁷⁸ “On approval of the draft laws of the Republic of Armenia “On Amendments and Addenda to the Law ‘On Procurement’” and “On Amendments to the Law on the Budgetary System of the Republic of Armenia””, Unified Website for Publication of Draft Legal Acts, <https://www.e-draft.am/projects/9302>.

business donations are not tax efficient, while there are no legal mechanisms to promote individual donations. In-kind donations are subject to VAT unless exemptions are provided in specific cases (see also Area 9: State Support).

As part of ongoing tax reforms, the government amended the Tax Code by increasing the turnover tax for most economic activities from 5% to 10% (effective January 2025) and by excluding legal and accounting services from the simplified turnover tax scheme, obliging businesses that provide such services to charge VAT and pay profit tax instead (effective from July 2025). As a result, CSOs outsourcing consultancy, expert, legal representation in court, or accounting services from companies or individual entrepreneurs now face higher operational costs.⁷⁹

In practice, CSOs do not face any restrictions in seeking, receiving, and using funding from a variety of sources. Seeking alternative funding has become particularly urgent in light of the crisis triggered by the termination of U.S. foreign assistance programs under an Executive Order, which has had a drastic impact on the sector. Many CSOs, including those working in human rights, watchdog activities, election observation and media, were heavily reliant on USAID and other U.S. funding. Therefore, the resulting decline in external support has led to a number of CSOs halting their activities and has forced larger organisations to scale back their operations.⁸⁰ Some CSOs, particularly those operating media outlets, launched crowdfunding campaigns through their websites or crowdfunding platforms; however, the amounts raised remain too small to cover their expenses. According to CSOs and experts, the public tends to donate to humanitarian, health, educational and social causes, while human rights, watchdog, culture and media organisations often fail to reach their fundraising targets.⁸¹

Business companies generally show little interest in CSO activities, although there are isolated cases of small-scale assistance in regional communities. More organisations explore economic activities as a source of self-funding. Yet they face serious difficulties, including unequal competition with private businesses, where CSOs usually lose out due to limited business skills, bigger administrative costs and the absence of a regulatory framework on social entrepreneurship.⁸² As a result, donor funding still remains the primary source of CSO income, while donations, entrepreneurial activities, membership fees, government and business support account for only a small share.

⁷⁹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

⁸⁰ Caucasus Watch, "After USAID: Armenian Civil Society at a Crossroads, Caucasus Watch", 14 August 2025, *op. cit.*; Tigran Grigoryan, "The impact of U.S. aid cuts on Armenia's civil society and media", *CivilNet*, 17 March 2025, *op. cit.*

⁸¹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025; Information check with ReArmenia Foundation, September 2025.

⁸² Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

Standard II: There is no distinction in the treatment of financial and material resources from foreign and international sources compared to domestic ones.

There are no legal restrictions for CSOs to receive donations, grants, or in-kind support from international sources. Tax treatment procedures are more beneficial in cases of funding from specific foreign sources, as CSOs may be exempted from VAT when purchasing goods or services under grant projects based on special intergovernmental agreements (for example, in the cases of EU funding). When funding is from other sources, tax exemptions can be provided by decision of the relevant authorised body qualifying the specific projects as charitable. This, however, entails a lengthy and bureaucratic process (see also Area 9: State Support). As to the tax treatment of in-kind support from international sources, goods received from abroad are subject to customs duties unless they are imported within the framework of charitable projects.

Negative narratives portraying CSOs as “*serving foreign interests*” persist in Armenia. However, these discourses are less about the actual funding sources of CSOs and rather reflect the depiction of the general sector in media and political rhetoric, echoing the regional “*foreign agent*” narratives used to stigmatise civil society (see more in Area 8: State Duty to Protect).

Specific recommendations in this Area are as follows:

- The Ministry of Finance provides a definition of “*grant*” in accordance with the best international practices and following consultation with CSOs and does not treat grant projects or other non-profit activities as economic activities;
- The Ministry of Finance creates a more favourable tax environment to improve the possibilities for CSOs to seek funding and in-kind support from diverse sources, including individual and business donations and direct entrepreneurship activities; and
- The Ministry of Finance ensures that state bodies cover the mandatory audit costs associated with grant/procurement funding and considers raising the threshold of the income subject to audit to reduce associated audit costs and reallocate them towards grant funding.

3.4 Freedom of Peaceful Assembly

Overall score per area: **5.2/7**

Legislation: **5.7/7**

Practice: **4.7/7**

The freedom of peaceful assembly is protected by Armenian legislation which is broadly in line with the relevant international standards. Everyone has the right to organise and/or participate in a peaceful assembly and this right shall be adequately protected wherever the assembly takes place. The organiser of the assembly is required to notify the local municipality if the planned assembly is to take place in an outdoor public space and if over 100 people are expected to participate. Spontaneous and urgent assemblies do not require any prior notification. Simultaneous assemblies and counter assemblies are not restricted. The law obliges the police to facilitate an assembly when it is peaceful, regardless of the fulfilment of the notification requirement. The police can stop an assembly only in cases where there is no other way to prevent a disproportionate restriction on others' fundamental rights or public interests.

In 2025, fewer large assemblies were held than in previous years, with most proceeding without interference. However, the levels of policing were often disproportionate when compared to the number of protesters. The Law on Police Guards, which entered into force in November 2025, emphasises the protection of participants' rights and mandates regular training. At the same time, accountability for previous unlawful conduct by the police remains weak, which continues to sustain concerns regarding the future proportionality and effectiveness of the new police unit. Overall, while the legal framework is enabling and assembly facilitation is generally adequate, inconsistent implementation, excessive policing at some events, and weak redress for previous violations continue to undermine the full enjoyment of the right to peaceful assembly in Armenia.

The score for the area remained the same as in 2024. The recommendations include: ensuring effective enforcement of the new standards on policing assemblies; preventing unlawful police actions; carrying out prompt, transparent, and effective investigations into all cases of police misconduct or any unlawful use of force during assemblies to ensure accountability; and declassifying information on the types and use of special means.

Standard I: Everyone can freely enjoy the right to freedom of peaceful assembly by organising and participating in assemblies.

According to the law, anyone has a right to organise and/or participate in a peaceful assembly, and such assemblies shall be adequately protected wherever they take place. Freedom of assembly is protected by the Constitution and may be restricted only by law for the protection of state security, the prevention of crime, the protection of public order, the protection of health, morals and/or the fundamental rights of others.⁸³ The

⁸³ RA Constitution amended 6 December 2015, Article 44.

Law on Freedom of Assembly defines assembly as “a peaceful, unarmed, temporary presence of two or more persons at a place with the intention of forming or expressing a common opinion on matters of public interest”.⁸⁴ Specific limitations on the exercise of the right to freedom of assembly are set for certain positions such as judges, prosecutors, investigators, as well as people serving in the armed forces, national security, police and other military bodies. When taking part in assemblies, members of these groups should observe political neutrality and not participate whilst wearing their uniforms.⁸⁵ Spontaneous and urgent assemblies do not require prior notification. Simultaneous assemblies and counter assemblies are not restricted. In general, the legislation on peaceful assembly is compatible with international standards. There are no regulations on digital or online assemblies as a type of peaceful assembly. While this means that there are currently no restrictions imposed on these types of assemblies, at the same time, there are no measures ensured for protecting participation in such assemblies.

According to the Criminal Code, obstructing or compelling the holding of or participation in an assembly, as well as materially incentivising or disincentivising participation in an assembly could lead to up to three years’ imprisonment for the relevant offender, with stricter measures being imposed if the offence was committed using official or service powers.⁸⁶ The provision related to criminalising material incentivisation was initially developed on the basis of CSOs’ suggestions during electoral legislation reforms, with the intent to prevent the use of financial incentives to compel participation or lack of participation in assemblies — a practice viewed as analogous to vote-buying.⁸⁷ According to the Venice Commission’s Amicus Curiae Brief issued in October 2025, states may have the power to regulate paid participation in assemblies, but primarily in the context of electoral campaign financing to ensure fair political competition. However, the Commission found that the term in the Criminal Code “*materially incentivising*” did not have sufficient precision meaning that it could be interpreted arbitrarily. The Commission warned that legitimate support, such as covering transport or organisational costs, could be wrongly criminalised and infringe on the right to peaceful assembly. The Commission recommended excluding such activities from the article’s scope and ensuring that any necessary measures to provide

⁸⁴ RA Law on Freedom of Assembly, 14 April 2011, last amended as of 14 November 2024, Article 2 (in Armenian), <https://www.arlis.am/hy/acts/199693>.

⁸⁵ *Id.*, Article 8.

⁸⁶ RA Criminal Code, 5 May 2021, last amended as of 2 August 2025, Article 236 (in Armenian), <https://www.arlis.am/hy/acts/210019>.

⁸⁷ Venice Commission of the Council of Europe, “Armenia - Explanatory note regarding the electoral reform and draft laws amending election-related laws and codes”, Strasbourg, 5 March 2021, <https://www.coe.int/en/web/venice-commission/-/cdl-ref-2021-018-e>; Meeting of CSO Meter Advisory Board, 31 October 2025.

transparency are clearly defined and proportionate.⁸⁸ In practice, a dozen individuals have been charged and detained under this article in the past three years.⁸⁹

In 2025, fewer large assemblies took place as compared to the previous years. For example, two counter assemblies were held in front of the Russian military base in Gyumri, one in support of the base and the other demanding the removal of the base.⁹⁰ A large number of police officers oversaw the assembly, while no incidents of unlawful treatment or detention was recorded by CSOs and experts. Another assembly where significant police forces were present was the protest by parents of missing soldiers, who demanded the reinstatement of the ex-head of the NSS to his position, after he was dismissed by the Prime Minister. Since the Head of the NSS is *ex officio* the head of the Governmental Commission on Issues of Prisoners of War, Hostages and Missing Persons, the parents of the missing soldiers were concerned that the ex-head of the NSS was already well aware of their issues and regularly provided information on the matters of their missing sons. Accordingly, they linked their hopes with this official. Even though the protesters kept one of the largest avenues in Yerevan blocked for two days, the police did not intervene and protected the assembly until the protesters unblocked the road following negotiations with officials.⁹¹ In late September 2025, the parents and relatives of the missing soldiers staged several protests in front of the building of the Ministry of Defence and demanded a meeting with officials to gain further information about the missing soldiers. When protesters blocked the entrance of the Ministry, military police attempted to clear the area, which resulted in some scuffles between officers and participants.⁹² Some other smaller picquets and protests took place through the year without police intervention. At the same time, in many

⁸⁸ European Commission for Democracy Through Law of the Council of Europe (Venice Commission), “Armenia Amicus Curiae Brief on the Compatibility of Article 236 of the Criminal Code with the European Standards on Legal Certainty”, *Adopted by the Venice Commission at its 144th Plenary Session*, Strasbourg, 13 October 2025, [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2025\)037-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2025)037-e).

⁸⁹ Armenian Center for Political Rights, “Statement on the opinion of Venice Commission on the crime of ‘materially incentivizing participation in an assembly’”, 15 October 2025, <https://drive.google.com/file/d/1vadWMd3Hsyus6mysNCbdH0sqfV-GCPYT/view>; Investigative Committee of the Republic of Armenia, “Criminal prosecutions were initiated against 58 people for committing apparent criminal acts during the protests, and detention was chosen as a preventive measure against 29 people: Summary”, 17 June 2024, <https://www.investigative.am/news/boghqi-akcianeri-yntacqoum-arerevuyt-hancavor-ararqneri-katarman-hamar-greakan-hetapndoum-e-haroucvel-58-andzi-nkatmamb-29-andzi-nkatmamb-xapanman-mijoc-e-yntavel-kalanqy-ampopoum>.

⁹⁰ Azatutyun, “Demonstrations in Gyumri against and in defence of the Russian military base”, YouTube Video, 23 August 2025 (in Armenian), <https://www.youtube.com/watch?v=9y2uD-1qTbg>.

⁹¹ News.am, “Armenian missing soldiers’ relatives spend night on Yerevan’s Marshal Baghramyan Avenue”, 19 June 2025 (in Armenian), <https://news.am/eng/news/889252.html>; Ruzanna Stepanyan, “Relatives of the missing have opened Baghramyan Avenue”, *Azatutyun.am*, 20 June 2025, <https://www.azatutyun.am/a/33449932.html>.

⁹² News.am, “Relatives of soldiers missing in 2020 war staging protest outside Armenia MoD”, 29 September 2025 (in Armenian), <https://news.am/eng/news/906951.html>; Aline Grigoryan, “Scuffle breaks out between relatives of missing servicemen and police outside MoD”, *Arminfo*, 29 September 2025 (in Armenian), https://arminfo.info/full_news.php?id=95055&lang=3.

cases, the number of the officers policing the assemblies was reported as disproportionate, sometimes exceeding the number of protesters several times over.⁹³

Standard II. The state facilitates and protects peaceful assemblies.

The notification process for holding a peaceful assembly prescribed by law is generally in line with international standards. For public assemblies taking place outdoors, the law requires that a written notification be sent to the head of the LSGB in which the assembly is planned to be held, no later than 72 hours prior to the date of the assembly. No notification is required for assemblies with 100 participants or less, for urgent and spontaneous assemblies, or for online assemblies and assemblies taking place indoors or on private land. The aim of the notification requirement is to ensure that the state can take necessary measures to secure the natural and peaceful course of the assembly, as well as protect the constitutional rights of other persons and the interests of the public.⁹⁴

After registering the notification, the local government immediately sends the notification to the police for an opinion. In cases where there is an intention to impose restrictions or to ban the assembly, the LSGB is obliged to organise hearings and notify the assembly organisers accordingly. Restrictions can be set in cases in which the time, place or method of the intended assembly may directly and disproportionately affect the fundamental rights or interests of other persons. In such cases, the authority may suggest that the organiser change the place, time or method of the assembly. An assembly is banned if its purpose is a violent overthrow of the constitutional order, an incitement of national, racial or religious hatred, or otherwise preaches violence or war. If no such decisions are taken by the relevant authority within the set timeframe, the notification is considered to be accepted.⁹⁵ The decision of the community head with regards to the holding of an assembly can be appealed in the administrative court at least seven days before the scheduled day of the assembly. The appeal should be reviewed within two calendar days.⁹⁶ In practice, most assemblies are held without notification – according to the information provided by the Ministry of Internal Affairs, only 133 out of 619 assemblies held in 2025 (as of 25 September 2025) provided a notification, while others were either urgent, spontaneous or small-sized assemblies.⁹⁷

The Law on Police Guards, which was adopted in 2024 and entered into force on 1 November 2025, defines the policing of assemblies and explicitly identifies that ensuring the protection of the rights and legitimate interests of assembly participants

⁹³ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

⁹⁴ RA Law on Freedom of Assembly, 14 April 2011, Articles 9-13.

⁹⁵ *Id.*, Articles 15-20.

⁹⁶ RA Administrative Procedure Code, 5 December 2013, amended as of 1 August 2025, Article 204 (in Armenian), <https://www.arlis.am/hy/acts/209969>.

⁹⁷ Information provided by the Ministry of Internal Affairs on 01 October 2025 in response to an enquiry by TIAC.

is one of the main functions of the police guards. Furthermore, the law requires police guards to undergo special preparation and regular training, including on policing assemblies, and sets out the specific conditions under which physical force or special means can be used.⁹⁸ In May 2025, the Minister of Internal Affairs approved a pilot standard operating procedure for the use of force by police officers,⁹⁹ and in October 2025, adopted this standard procedure, as well as published draft general standards on the use of enforcement means for public consultation.¹⁰⁰ Therefore, in principle, these provisions could mitigate the risk of inconsistent and disproportionate actions by the police guards. However, experts that were interviewed for this report expressed concerns that the new service is expected to be staffed largely by former police officers and that long-standing issues, such as poor working conditions and the absence of criminal accountability for conduct that was previously unlawful, raise doubts as to whether the approach to policing assemblies will substantially change in the near future. Therefore, changes are yet to be seen in practice.¹⁰¹

There were no documented cases of limiting access to the internet or of any other methods that were used to restrict assembly organisers from distributing information about upcoming assemblies.

Standard III: The state does not impose unnecessary burdens on organisers or participants in peaceful assemblies.

According to the law, the organiser of an assembly shall take necessary measures to ensure the normal course of an assembly such as by calling on assembly participants to refrain from violence, preventing violent actions and separating peaceful participants from participants who want to exercise force. The organiser should also inform the participants about the relevant police requirements, for example in cases where the police requires the participants to clear the streets or stop the assembly.¹⁰² The police are obliged to be present at an assembly as soon as they are informed about it and are also obliged to remove persons who grossly violate the peaceful and normal course of the assembly from the venue.¹⁰³ There are no fees required from the state for holding an

⁹⁸ RA Law on Police Guards, 24 October 2024 (in Armenian), <https://www.arlis.am/hy/acts/199700>.

⁹⁹ RA Minister of Internal Affairs Order No. 35-L "On Approving pilot standard operating procedure for the use of force by police officers", 7 May 2025, <https://mia.gov.am/wp-content/uploads/2025/05/4c67761f3de24a10ed32bc4a01233181bfe86e1bd5344aff964d3424c2f9a6b.pdf>.

¹⁰⁰ RA Minister of Internal Affairs Order No. 6-N "On Establishing Standardised Procedures for the Use of Force Measures by Police Officers", 30 October 2025 (in Armenian), <https://www.arlis.am/hy/acts/215815>; Draft Order of the RA Minister of Internal Affairs "On Establishing Standardized Procedures for the Use of Coercive Measures by Police Officers", Unified Website for Publication of Draft Legal Acts (in Armenian) <https://www.e-draft.am/projects/9263/about>.

¹⁰¹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

¹⁰² RA Law on Freedom of Assembly, 14 April 2011, Article 31.

¹⁰³ *Id.*, Article 32.

assembly or any other associated costs. The law does not hold assembly organisers liable for the actions of assembly participants.

No restrictions on communicating that an assembly is taking place (including through online means) or on the use of equipment during assemblies were reported by assembly organisers.

Standard IV: Law enforcement supports peaceful assemblies and is accountable for the actions of its representatives.

The law sets out clear regulations on the use of force, special means and surveillance devices by the police. However, there are no specific regulations on the policing of assemblies. In cases where the notification requirement has not been fulfilled, the police shall announce by loudspeaker that the assembly is unlawful and that the participants may be held liable. In any case, the law obliges the police to facilitate an assembly when it is peaceful regardless of the fulfilment of the notification requirement. The police can only stop an assembly if it has not been possible to prevent the disproportionate restriction of others' fundamental rights or public interests by lesser means. To stop the assembly, the police must communicate the request to the organiser or, if there is no organiser (or the organiser does not execute this request), announce the request to stop the assembly at least twice by loudspeaker, setting a reasonable time and warning about the possibility of the application of "*special means*" (such as tear gas, the use of water cannons, stun grenades, etc.) if participants do not adhere to the request. In cases of mass disorder, the police are authorised to take immediate measures without prior notification.¹⁰⁴

The Law on Police sets out a ban on the use of special means by police to disperse peaceful assemblies which are held in violation of public order but without the use of weapons and on the inclusion in police armour of such types of special means that can cause severe damage to health or pose an unsubstantiated source of risk.¹⁰⁵ The Law obliges police officers to wear a prescribed uniform with visible signs when carrying out duties related to the maintenance of public order.¹⁰⁶ The Law also sets out regulations on the use of surveillance technologies to ensure proper notification on the use of such equipment and the protection of personal information. Warning signs must be visible with regards to stationary video and photo equipment placed in public places. When using mobile equipment, police officers must transport it in a visible manner, except in cases when surveillance is being conducted for special investigative purposes. The resulting videos or photos may be used for specific narrow purposes, without disclosing or only minimally identifying the identities of other persons. The use of

¹⁰⁴ *Id.*, Articles 32 and 33.

¹⁰⁵ RA Law on Police, 16 April 2001, last amended as of 6 November 2025, Article 31 (in Armenian), <https://www.arlis.am/hy/acts/215512>.

¹⁰⁶ *Id.*, Article 12.

videos or photos by the police for other purposes (including publishing) is prohibited. The list of officers having access to the archive and the procedure for using the data is defined by the Order from the Chief of Police.¹⁰⁷

Information on the types and quantity of special means available to the police remains classified since July 2024 (after the use of flashbang and stun grenades during protests in June 2024),¹⁰⁸ which is not in line with international standards, particularly UN guidelines stating that law enforcement agencies should be transparent about the types of less lethal weapons at their disposal.¹⁰⁹

The amendments to the Law on Police adopted in 2025 have allowed the Ministry of Internal Affairs access to real-time surveillance systems installed on the exterior of state and municipal buildings, airports, border checkpoints and public parking areas, as well as in public transportation, as well as request video recordings from these locations.¹¹⁰ The amendments set out that access to video surveillance systems and video recordings and the usage and processing of data through surveillance systems may be carried out only for the exhaustive list of purposes provided by the law and to the minimum extent necessary to achieve those purposes. Access to surveillance data shall be electronically logged with mandatory timestamping of downloaded footage and any data that is obtained shall be stored in secret. Moreover, the amendments establish liability for any violations of these provisions. The Law further permits the use of surveillance systems to identify individuals where there is reasonable suspicion of a crime or an administrative offence. Although the adopted amendments introduce safeguards and significantly limit the scope of surveillance in contrast to the draft amendments published in 2024,¹¹¹ they still provide grounds for concerns related to the broad concept of “*offence*”, interpreted by the law-makers as any offence, including “*littering the street*”.¹¹² Due to the limited trust and lack of independent oversight over law enforcement bodies, such a broad interpretation provides the risk of unlawful surveillance, which in the context of freedom of assemblies can have a “*chilling effect*” on participants and reduce both the number of assemblies and the number of participants who wish to attend them.¹¹³

¹⁰⁷ *Id.*, Article 22.

¹⁰⁸ RA Minister of Internal Affairs Order No. 55-L dated 12 July 2024, published on 15 July 2024, RA Ministry of Internal Affairs (in Armenian), <https://mia.gov.am/2024/07/15/55/>.

¹⁰⁹ United Nations Human Rights, “Guidance on Less-Lethal Weapons in Law Enforcement”, New York and Geneva, 2020, https://www.ohchr.org/sites/default/files/Documents/HRBodies/CCPR/LLW_Guidance.pdf

¹¹⁰ Amendments to the RA Law on Police, 5 March 2025 (in Armenian), <https://www.arlis.am/hy/acts/204977>.

¹¹¹ See more information at: CSO Meter, “Armenia: Surveillance Law proposal on hold amid public concerns”, 28 November 2024, <https://csometer.info/updates/armenia-surveillance-law-proposal-hold-amid-public-concerns>.

¹¹² Factor TV, “Those who litter on the street will be identified through cameras and an administrative offense will be filed”, YouTube Video, 4 March 2025 (in Armenian), <https://www.youtube.com/watch?v=RyTC4LHqWm>

¹¹³ Armenian Center for Political Rights, “‘Big Brother’ in Armenia: Report on a new law authorizing remote biometric surveillance by the Ministry of Internal Affairs”, 3 May 2025, https://drive.google.com/file/d/1Tbz3Am0PYMhAFxhbjLT737vBeX5P_ztT/view

The lack of transparent investigations and sanctions applied against police officers who have acted unlawfully during assemblies is still a prominent issue. According to the latest data provided by the Ministry of Internal Affairs, in 2024, the Ministry conducted 33 internal investigations on the grounds of police violations during assemblies, with no consequences in 18 cases and criminal proceedings launched in 15 cases. In 2025, as of September 2025, the Ministry of Internal Affairs conducted two internal investigations related to violations during assemblies which did not lead to any consequences for the police officers involved.¹¹⁴ As of November 2025, no police officer had faced criminal charges for violations on the assembly of 12 June 2024, where 101 people suffered injuries, including from fragments of a grenade which had been allegedly used unlawfully by the police.¹¹⁵

Specific recommendations in this Area are as follows:

- The Ministry of Internal Affairs ensures effective enforcement of new standards on policing assemblies through the continuous training of Police Guards and ensuring consistent, professional and rights-based practices, which would guarantee that any use of force or special means would be lawful, necessary and proportionate and that any unlawful police actions would be effectively prevented and sanctioned where necessary;
- Law enforcement bodies carry out prompt, transparent and effective investigations into all cases of police misconduct or the unlawful use of force by police during assemblies, ensuring accountability through appropriate sanctions; and
- The Ministry of Internal Affairs declassifies the data on the types and use of “*special means*” by the police and makes the relevant data publicly available.

¹¹⁴ Information provided by the Ministry of Internal Affairs on 1 October 2025 in response to an enquiry by TIAC.

¹¹⁵ See more at TIAC, ECNL, “CSO METER: Empowered for Action. Armenia 2024 Country report”. *CSO Meter*, 2024, <https://csometer.info/sites/default/files/2025-01/ENG%20Armenia%202024%20CSO%20Meter%20Country%20Report.pdf>

3.5 Right to Participation in Decision-Making

Overall score per area: **4.9 / 7**

Legislation: **5.4 / 7**

Practice: **4.3 / 7**

The legislation provides a variety of institutional mechanisms aimed at engaging civil society and the public in the decision-making process, including the use of an electronic platform for public consultations, petitions, parliamentary hearings and consultative bodies. However, participation in practice remains inconsistent and is sometimes lacking in regularity and any meaningful impact. Participation opportunities vary widely across institutions and communities, with large in-person discussions being mostly initiated by CSOs and international organisations. On the positive side, new measures such as, the establishment of the Department on Participatory and Open Issues, the Prime Minister's decree reinforcing public councils in governmental bodies and steps to modernise strategic management procedures, could enable more regular participation and improve inclusivity if consistently applied.

As in the previous year, CSOs note a trend of selective engagement in invitation-based meetings, with limited transparency on how participants are chosen and concerns that critical voices may be excluded. Local participation is frequently formalistic with limited outreach, while environmental hearings in mining-affected communities have been marred by pressure on residents which has discouraged continued engagement from these communities. The lack of institutional mechanisms for meaningful engagement with the National Assembly challenges the overall participation framework, although some effective dialogue exists with individual MPs. Strategic litigations against public participation (SLAPPs) continue to deter civic engagement, with no protective measures being taken as at the time of writing this report.

Despite legal guarantees and the Law on Freedom of Information, practical gaps in responses to information requests remain, with many responses being delayed, incomplete or lacking in the requisite level of detail. Proactive disclosure of information by state bodies in practice is also often not compliant with the legal requirements. The draft Law on Public Information, approved by the government and pending parliamentary adoption, is expected to expand the proactive publication of information.

Draft amendments to the Law on Public Service published by the government in October 2025 aim to advance the transparency in policy-influencing interactions by officials without imposing reporting duties on CSOs. However, some concerns remain that the new requirements may discourage some officials from engaging effectively with CSOs.

The scores in this area, as well as most of the recommendations from 2024, remain the same. It is particularly recommended that the National Assembly define mechanisms for the mandatory public discussion of drafts initiated by MPs, while working with the government to use existing participation tools more effectively to ensure meaningful participation. This would engage CSOs at the early stages of decision-making and provide clear consequences for non-compliance. Several recommendations call for enhanced access to information through timely responses from the state, open-data publication, free access to key government

databases and the creation of an independent oversight body. Additionally, the recommendations urge the government to support CSO involvement in policy monitoring and implementation through institutional and financial measures.

Standard I: Everyone has the right to participation in decision-making.

According to the law, everyone has a right to participate in decision-making in Armenia and several opportunities are provided for the participation of citizens and CSOs in decision-making. However, the accountability mechanisms for non-compliance with the participation requirements are weak.

The Constitution sets out the right of citizens to present petitions and legislative initiatives to decision-makers. In particular, at least 50,000 citizens who have the right to vote can propose a draft law to the National Assembly.¹¹⁶ Based on a citizen initiative launched in September 2024 which collected over 51,000 signatures, the National Assembly adopted the law on Initiating the Process of Armenia's Accession to the European Union in March 2025.¹¹⁷

According to the Law on Normative Legal Acts, it is mandatory to have public consultation on new legislative acts, except in the cases of legal drafts of the ratification of international agreements. Public consultations take place continuously through an online platform (e-draft.am), while additional in-person public hearings, surveys and discussions can be organised at the discretion of the law-making body. The minimum duration for public consultations is fifteen days and the results of public consultations should also be published along with the revised legal act. In instances where draft legislation submitted to the government has not passed the public consultation stage, the government can return it to the body making the relevant submission.¹¹⁸ These provisions, however, do not extend to draft legislation which is initiated by the National Assembly or is presented as a result of citizen initiatives.¹¹⁹ Furthermore, legal acts related to a state of emergency or martial law are also not subject to mandatory public consultation. However, these can be consulted on at the suggestion of the relevant body that prepares or adopts the draft legislation.¹²⁰

There are no administrative sanctions for violating the provision on mandatory public consultation. The procedure for organising and conducting public consultations states that individuals and organisations can apply to the decision-making body, as well as to

¹¹⁶ RA Constitution, 5 July 1995, amended on 6 December 2015, Article 109.

¹¹⁷ See more information at: CSO Meter, "Armenia: Following a citizen legislative initiative, National Assembly passed a law to initiate EU accession in first reading", 3 March 2025, <https://csometer.info/updates/armenia-following-citizen-legislative-initiative-national-assembly-passed-law-initiate-eu>

¹¹⁸ RA Law on Normative Legal Acts, 21 March 2018, last amended as of 6 January 2024, Articles 3 and 4 (in Armenian), <https://www.arlis.am/hy/acts/187324>.

¹¹⁹ *Id.*, Article 1.

¹²⁰ *Id.*, Article 27.1.

the Ministry of Justice, to receive explanations in cases where violations in the process of public consultations are identified.¹²¹

The parliamentary rules of procedure state that parliamentary hearings can be organised by the decision of the President of the National Assembly, by permanent or temporary committees, or by factions.¹²² As of the end of November 2025, fewer parliamentary hearings were held compared to the previous year (six in comparison to ten in 2024), mostly following the initiative of various standing committees.¹²³ Information on upcoming hearings is published on the website of the National Assembly and the hearings are broadcast live. In addition, parliamentary committees organise working discussions with CSOs and experts on an invitation-only basis.

At the local level, there are several provisions regarding the participation of community members in local self-government. According to the law, sessions of community councils are open to the public and are broadcast online in communities with more than 3,000 residents. Public hearings are mandatory for the consultation of draft five-year community development programmes and also for the annual budget.¹²⁴ It is also possible to participate through online channels available at community websites (such as by providing comments, suggestions and proposals for participatory budgeting projects).

There are no legal provisions on SLAPPs. Judicial hearings regarding litigations brought by mining companies against environmental activists based on libel and defamation allegations have continued in 2025. Relatedly, in May 2025, the Zangezur Copper-Molybdenum Combine (ZCMC) sued eight former employees who were dismissed following their participation in a strike, seeking AMD 4.7 billion (around 10.7 million EUR) in damages and securing liens on their assets. Civil society groups warned that the lawsuit is intended to intimidate workers and stifle future activism in Armenia's extractive sector.¹²⁵ This case was recognised as a SLAPP case by the Business and Human Rights Resource Center.¹²⁶ These and other SLAPP cases generally have the effect of discouraging public participation in matters of public interest and

¹²¹ The Procedure of Organising and Conducting Public Consultations, Appendix to the RA Government Decision No. 1146-N dated 10 October 2018 (in Armenian), <https://www.arlis.am/hy/acts/126002>.

¹²² RA Constitutional Law on the Charter of the National Assembly, 16 December 2016, last amended as of 1 August 2025, Article 125 (in Armenian), <https://www.arlis.am/hy/acts/209968>.

¹²³ Based on a review of the 'News' section of the National Assembly website, <http://parliament.am/news.php?lang=arm>.

¹²⁴ RA Law on Local Self-Government, 7 May 2002, revised 16 December 2016, last amended as of 9 August 2025 (in Armenian), <https://www.arlis.am/hy/acts/210071>.

¹²⁵ CSO Meter, "Armenia: Lawsuit against striking mine workers threatens environmental civic activism", 19 June 2025, <https://csometer.info/updates/armenia-lawsuit-against-striking-mine-workers-threatens-environmental-civic-activism>;

¹²⁶ Business and Human Rights Resource Center, "Eight former employees of Zangezur Copper Molybdenum Combine CJSC (ZCMC)", <https://www.business-humanrights.org/en/latest-news/8w-am-may-2025/>

intimidating freedom of expression (see also in Area 6: Freedom of Expression and Area 8: State Duty to Protect).¹²⁷

In March 2025, the parliament adopted the Law on Youth Policy, establishing: (a) a framework for promoting youth participation in public life; (b) government collaboration with youth-focused CSOs; (c) the adoption of local youth policies; and (d) the creation of community youth centres.¹²⁸ CSOs noted the extensive participatory process in drafting the law,¹²⁹ as well as more active communication between the municipality and the youth population in specific communities. However, some CSOs remain sceptical about the implementation of the new provisions, citing limited attention to the needs of the youth population in smaller and remote communities.¹³⁰

Generally, CSOs report varied experiences in participation depending on the theme, the specific government agency or the community, as well as the individual approach of the officials involved. Many government representatives are responsive to meeting requests and are open to dialogue. Furthermore, CSOs have opportunities to engage in consultations organised by state bodies and in parliamentary hearings. For example, in contrast to previous years, the Ministry of Internal Affairs has frequently conducted public consultations in 2025 and has shown a greater openness to implementing the recommendations of CSOs, including through sessions of its public council. However, large in-person public discussions are mostly initiated by CSOs or international organisations rather than by the relevant state bodies.¹³¹

CSOs also mention that, despite the participation platforms and opportunities, the participation might be just a formality and the relevant institutions might fail to consider the contributions of CSOs without proper justification. There are also cases in which already-agreed draft documents substantially change and fail to reflect agreed contributions in the next stages of law-making, particularly during parliamentary sessions. In addition, CSOs mention that they have noticed a selective approach to the engagement of participants in invitation-based discussions. Those who express critical or dissenting opinions might not be invited to further meetings. Some experts note preferential treatment towards certain CSOs which are perceived as being closely aligned with the government. These CSOs receive first-hand information and are

¹²⁷ Interviews conducted in the framework of CSO Meter research, August-September 2025; Tatevik Gharibyan, "Strategic Lawsuits Against Public Participation in Armenia", *Human Rights House Yerevan Human Rights Defender* NGO, Yerevan 2025, <https://hrhyerevan.org/wp-content/uploads/2025/07/SLAPPs-report-2025en.pdf>.

¹²⁸ RA Law on Youth Policy, 5 March 2025 (in Armenian), <https://www.arlis.am/hy/acts/204846>

¹²⁹ See more information at: CSO Meter, "Armenia: New Law on Youth Policy: a significant step for youth development and participation", 14 March 2025, <https://csometer.info/updates/armenia-new-law-youth-policy-significant-step-youth-development-and-participation>

¹³⁰ Focus group discussions conducted in the framework of CSO Meter research, September 2025.

¹³¹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

invited to closed-door meetings which potentially undermines opportunities for equal participation.¹³²

The scope and effectiveness of local-level participation and dialogue often depends on the availability of resources for participation and the expert capacities of local CSOs to communicate and provide meaningful input, as well as the personal attitudes of community leaders. In many cases, public hearings on community budgets and development plans are treated as formalities, involving mainly municipal staff and lack proactive efforts to inform and engage with a broader range of residents. While in some communities, local authorities demonstrate openness to engage with CSOs and the public, in others participation has declined (for example in Gyumri following changes in municipal leadership).¹³³

CSOs and citizens face challenges when participating in local public hearings on environmental issues. Public hearings are mandated by law in communities which might have their environment impacted from a proposed project, such as construction, production or mining projects.¹³⁴ However, large economic interests make communities vulnerable as municipalities and residents may face pressure and harassment from mining companies to secure their agreement. The most notable example in 2025 was the public hearings in Karaberd village, where over the past four years, twelve such hearings have been convened in the community to discuss mine expansion and new exploitation projects, but the repeated objections made by the village's residents have been ignored. According to experts, repeated pressure on inhabitants after each hearing has discouraged the participation of the residents, leaving only a handful of residents attending, with many voicing their opposition in fear. CSOs have denounced these practices as authoritarian which serve as examples of the suppression of freedom of speech of the residents, as well as demonstrating violations of social and ecological rights.¹³⁵

Standard II: There is regular, open and effective participation of CSOs in developing, implementing and monitoring public policies.

The legislative framework defines several mechanisms for open and regular public participation in developing public policies. These mechanisms include the publishing of legal drafts on the unified platform for public comments, the organisation of public hearings and the creation of consultative bodies.

¹³² *Ibid.*

¹³³ *Ibid.*

¹³⁴ RA Law on Environmental Impact Assessment and Examination, 21 June 2014, last amended as of 9 June 2023 (in Armenian), <https://www.arlis.am/hy/acts/178468>.

¹³⁵ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025; Transparency International Anticorruption Center, "Civil Society's Statement 'On the Anti-democratic Practices Rooted in the Pambak, Lori Region'", 19 August 2025 (in Armenian), <https://transparency.am/hy/media/statements/article/5350>.

Based on the Open Government Partnership (OGP) Action Plan 2022-2024,¹³⁶ and Armenia's 2023-2025 Public Administration Reform Strategy,¹³⁷ in December 2024 the government established a Department on Participatory and Open Government Issues in the Prime Minister's Office to promote participatory governance processes.¹³⁸ The key functions of the new department include developing and monitoring participatory governance methodologies, coordinating open government programs and strengthening cooperation between the government and CSOs. The department institutionalises the government's efforts to ensure public participation in policymaking as one of the Public Administration Reform priorities.¹³⁹ In line with these efforts, the draft OGP Action Plan for 2025-2027, published by the government for public consultation, includes a commitment to strengthen participatory governance in the public administration system, particularly through capacity-building measures and through the introduction of unified participatory governance guidelines for state bodies.¹⁴⁰

The charters of government ministries include a provision for public councils to be set up to ensure the participation of civil society in the implementation of the objectives and functions of the relevant ministries.¹⁴¹ The public councils are established through an announcement and are open to all citizens and organisations with experience in the relevant areas. The final decision on the composition of the council is signed by the respective minister who is also the chair of the council. However, in practice, these councils are not always functional and are often described by CSOs as a "*formality*". As of November 2025, according to information published on the official websites of the ministries, public councils were convened in only four of twelve ministries in 2025.¹⁴²

In September 2025, the Prime Minister issued a decree introducing new regulations regarding public councils. Under the adopted working procedure, all draft strategies, concepts and programmes developed by ministries (as well as other government bodies) must be discussed with public council members both at the initial concept stage

¹³⁶ RA Government Decision No. 1568-L "On approving the Open Government Partnership Action Plan of the Republic of Armenia for 2022-2024", 06 October 2022, amended on 9 November 2023 (in Armenian), <https://www.arlis.am/hy/acts/185253>.

¹³⁷ RA Government Decision No. 691-L "On approving the strategy of public administration reforms, the roadmap and result framework for 2022-2024, the list of persons providing monitoring and coordination of the strategy implementation", 13 May 2022, amended on 11 August 2023 (in Armenian), <https://www.arlis.am/hy/acts/181462>.

¹³⁸ RA Prime Minister's Decree No. 1204-L "On Amendments and Supplements to the Decree of the RA Prime Minister No. 564-L dated May 25, 2018", 26 December 2024 (in Armenian), <https://www.arlis.am/hy/acts/201524>.

¹³⁹ See more information at: CSO Meter, "Armenia: Government establishes new department to boost public participation and principles of open government", 29 January 2025, <https://csometer.info/updates/armenia-government-establishes-new-department-boost-public-participation-and-principles>

¹⁴⁰ "The Action Plan of the Republic of Armenia for 2025-2027 within the framework of the 'Open Government Partnership-Armenia' initiative" (draft), Unified Website for Publication of Draft Legal (in Armenian), <https://e-draft.am/projects/9336>.

¹⁴¹ RA Government Decision No. 1552-L 'On Amendment to the Decision No. 624-L of the Government of the Republic of Armenia dated May 22, 2018', 27 December 2018 (in Armenian), <https://www.arlis.am/hy/acts/127419>.

¹⁴² Official websites of the 12 ministries, listed on the website of the RA Government, <https://www.gov.am/en/structure/>.

and again after the development of the legal act, before the official circulation of the draft.¹⁴³ The procedure also allows for remote participation in council meetings. This need was repeatedly stressed by regional CSOs that cannot easily travel to Yerevan for in-person sessions. While this framework strengthens the formal role of public councils as participatory platforms for dialogue between the state and CSOs, its actual impact will depend on how consistently it is implemented.

According to government procedure, public consultations on draft normative legal acts developed by a government agency should take place through the publication of the draft on the official website of the given agency, as well as on the Unified Website for the Publication of Draft Legal Acts administered by the Ministry of Justice (www.e-draft.am).¹⁴⁴ The legislative drafts are published with descriptions and justifications and the platform allows submission of proposals, which are made public together with the feedback from the responsible agency. CSOs consider the platform useful for accessing information and submitting proposals but highlight several shortcomings, including the lack of publications of revised drafts, delayed or absent feedback, insufficient justifications in cases where proposals are rejected and short consultation periods. Most importantly, there are no mechanisms to track changes or provide input on revised versions which forces CSOs to monitor government and parliamentary websites and/or contact decisionmakers directly, while the final legislation can differ significantly from the draft initially published for consultation.¹⁴⁵ On the positive side, the government is in the process of modernising the e-draft platform and plans to address some of the highlighted challenges in the new version of the platform, including the possibility for tracking changes made in and the status of the relevant drafts.¹⁴⁶

According to the procedure on public consultations, public hearings and surveys are optional. CSOs state that in-person discussions should take place ahead of the development of the draft so that they can provide meaningful input. The organisation of in-person discussions at the early stages of legal drafting depends on the initiating body. CSOs note that while government representatives often listen attentively during consultations, their input is frequently disregarded in the final draft(s), which

¹⁴³ RA Prime Minister's Decree No. 835-L "On approving the rules of procedure and formation procedure of the Public Council of Ministries of the Republic of Armenia", 22 September 2025 (in Armenian), <https://www.arlis.am/hy/acts/212663>.

¹⁴⁴ The Procedure of Organising and Conducting Public Consultations, Appendix to the RA Government Decision No. 1146-N dated 10 October 2018 (in Armenian).

¹⁴⁵ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

¹⁴⁶ Information check with government representative, September 2025; RA Government Decision No. 813-N "On Amendments to the Decision of the Government of the Republic of Armenia N 1146 dated October 10, 2018", 20 June 2025 (in Armenian, to enter into force after the official launch of an updated version of the e-draft website), <https://www.arlis.am/hy/acts/208527>.

undermines the motivation of CSOs and their trust in the process.¹⁴⁷ In-person consultations are usually held in Yerevan without the possibility of remote participation, which makes the participation of regional CSOs less feasible.

Following the discussion of the concept of the government's strategic governance system in 2024, the government adopted amendments to the Rules of Procedure of the Government, introducing a new section regarding Strategic Management Procedure. Prior to the adoption of the amendments, the government published the draft on the e-draft platform for public consultation and discussed the draft with stakeholders in August 2025. Under the new framework, the government identified six key strategies that will serve as a basis for all other strategic programmes. The procedure identifies transparency, accountability, evidence-based policy making and inclusivity among the guiding principles of strategic management. Moreover, the procedure requires discussions with multiple stakeholders at different stages of strategy development.¹⁴⁸ However, unlike the 2024 draft, the adopted version neither specifies participatory mechanisms nor inclusivity criteria. According to the government representative, more details will be clarified through subsequent guiding documents.¹⁴⁹

To address the gap in holding public consultations at the early stages of legislation, CSOs have initiated an advocacy process to amend the Law on Normative Legal Acts through continuous dialogue with the government and civil society stakeholders. The proposals, which build on CSO feedback and recommendations from the CSO Meter report, introduce the concept of an “*early (preparatory) stage*” in the development of legal acts and suggest mandatory in-person discussions in cases of legislation with high public importance, while also providing an option for remote participation.

In 2025, government bodies engaged more actively in public consultations on budget drafts. The Ministry of Finance publishes announcements and the outcomes of these consultations on a dedicated webpage. While all agencies are mandated to conduct such consultations, only ten out of 34 state bodies collected public input in 2025, an improvement compared to 2024 where just five agencies collected public input.¹⁵⁰

At the local level, public participation is legally required for consultations on community development programmes, annual budgets and subsidy programmes that are submitted to the government for state funding. In addition, the Law on Local Self-Government provides an opportunity for citizens to include a discussion issue on the

¹⁴⁷ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

¹⁴⁸ RA Government Decision N 1342-L “On amendments and additions to Government Decision No. 252-L “On Approving the Government Rules of Procedure” dated 25 February 2021”, 18 September 2025 (in Armenian), <https://www.arlis.am/hy/acts/212560>.

¹⁴⁹ Interview conducted in the framework of CSO Meter research, August 2025.

¹⁵⁰ Ministry of Finance of the Republic of Armenia, “Public consultations on budgeting”, https://minfin.am/hy/page/hy_government_list_1.

agenda of community council sessions if such an issue is supported by a petition with a certain number of signatures.¹⁵¹

In recent years, many communities have introduced participatory budgeting which allows citizens to propose and vote on projects that are further funded from local budgets.¹⁵² In 2025, to support this process, the government allocated one billion AMD (around 2.3 million EUR) in funding to 21 communities implementing participatory budgeting, requiring at least 20% co-funding from local budgets,¹⁵³ while other communities also launched citizen-initiated projects from their own funds. A provision on participatory budgeting among the mandatory community functions has been included in the draft amendments to the Law on Local Self-Government, thereby providing a basis for institutionalising these practices.¹⁵⁴ However, several challenges persist, including the low awareness and motivation of citizens, limited digital skills needed to submit or vote for proposals online, as well as the restriction that, when using state subsidies, only projects aimed at developing the socio-economic infrastructure of communities are eligible.¹⁵⁵ CSOs also note that committees overseeing the process are dominated by local authorities rather than by civil society. This creates risks that municipalities advance their own projects under the guise of citizen initiatives.¹⁵⁶

There is no legal enforcement of participation in policy implementation and monitoring. The practice of engaging CSOs in the stages of implementation, monitoring and evaluation of state policies and programmes is limited and often depends on the proactiveness of CSOs and the availability of donor-funded programmes. The government decision on Strategic Management Procedure provides that strategies may be subject to independent alternative monitoring, with the resulting reports to be reviewed by the relevant working group.¹⁵⁷ Although alternative reports from CSOs have usually been considered by government bodies in the past, this provision could strengthen their formal acknowledgement and ensure more systematic consideration. Working groups, committees and multi-stakeholder groups that have been set up for specific policy areas, drafts or programmes demonstrate successful experiences of collaboration, but these remain limited in scope and impact (see more in Area 10: State-CSO Cooperation).

¹⁵¹ RA Law on Local Self-Government, 7 May 2002, revised 16 December 2016, Article 14.

¹⁵² Ministry of Finance of the Republic of Armenia, “Participatory budgeting”, https://minfin.am/en/page/en_participatory_1.

¹⁵³ RA Government Decision No. 188-N “On amendments and additions to the RA Government Decision No. 1890-N dated 2 November 2023”, 20 February 2025 (in Armenian), <https://www.arlis.am/hy/acts/203408>.

¹⁵⁴ Package of Draft Law on Amendments to the Law on Local Self-Government and Related Laws, Unified Website for Publication of Draft Legal, <https://e-draft.am/projects/9105/about>.

¹⁵⁵ Independent Reporting Mechanism “Results Report: Armenia 2022–2024”, *Open Government Partnership*, June 2025, https://www.opengovpartnership.org/wp-content/uploads/2025/06/Armenia_Results-Report_2022-2024_EN.pdf

¹⁵⁶ Focus group discussions conducted in the framework of CSO Meter research, September 2025.

¹⁵⁷ RA Government Decision No. 1342-L “On amendments and additions to Government Decision No. 252-L “On Approving the Government Rules of Procedure” dated 25 February 2021”, 18 September 2025.

CSOs and media organisations registered in Armenia can participate in the process of monitoring public procurements by taking part as observers in the process of accepting the deliverable of the procurement contract by the respective state department (if procurements do not contain state secrets), based on their application and respective certification by the Ministry of Finance.¹⁵⁸ As of August 2025, fourteen CSOs and one media company have been certified to enable them to monitor the deliverables of public procurements (compared to only three CSOs registered as of August 2024).¹⁵⁹

Standard III: CSOs have access to information necessary for their effective participation.

Armenian legislation provides clear procedures on access to information, including the requirement for state bodies to disclose information related to the decision-making process. Access to information is guaranteed by the Constitution.¹⁶⁰ According to the Law on Freedom of Information, responses to written information requests should be submitted to the applicant within five days of receipt, but in cases where additional effort is required to provide the information, this timeline is extended to 30 days.¹⁶¹ Restrictions exist on information that is related to national security, professional confidentiality, private information and copyrighted data. Further restrictions exist on the provision of data concerned with the preliminary examination of criminal proceedings not subject to publication, as well as on information that contains state, banking, commercial secrets or other official information of limited distribution.¹⁶² The concept of “*official information of limited distribution*” refers to information that is not classified as secret, but should be restricted as its dissemination can harm the country’s “*protection, foreign relations, political and economic interests, [or the] protection of the legal system*”.¹⁶³

The fee charged by public administrations and institutions, LSGBs and other organisations for providing the relevant information includes only the technical costs of providing such information, with no charges associated with printing or copying information that is ten pages or less, providing information by email or responding to written inquiries.¹⁶⁴ The Code on Administrative Offences sets fines for information holders that illegitimately do not provide information at a range of 30,000-70,000

¹⁵⁸ RA Government Decision No. 732-N ‘On Amendments and Additions to Decision No. 526-N dated May 4, 2017’, 23 May 2024 (in Armenian), <https://www.arlis.am/hy/acts/193122>.

¹⁵⁹ Ministry of Finance, “List of Public Organisations and Persons Carrying out Informational Activities Entitled to Participate in the Process of Acceptance of the Contract Performance Results”, 27 August 2025 (in Armenian), retrieved from the Procurement System of the Republic of Armenia, Ministry of Finance, <https://gnumner.minfin.am> (accessed September 2025).

¹⁶⁰ Constitution of the Republic of Armenia, 5 July 1995, amended on 6 December 2015, Article 51.

¹⁶¹ RA Law on Freedom of Information, 23 September 2003, last amended as of 6 April 2023, Article 9 (in Armenian), <https://www.arlis.am/hy/acts/175858>.

¹⁶² *Id.*, Article 8.

¹⁶³ RA Law on State Secrecy, 1 March 2023, last amended as of 6 April 2025 (in Armenian), <https://www.arlis.am/hy/acts/204813>.

¹⁶⁴ RA Law on Freedom of Information, 23 September 2003, Article 10.

AMD (around 68-159 EUR), while the same violation repeated within a year is subject to a fine of 100,000-150,000 AMD (around 228-341 EUR).¹⁶⁵ The government's Unified Platform for Electronic Inquiries is found at www.e-request.am,¹⁶⁶ which serves as the website for submitting and tracking online applications, requests or complaints to state authorities. Some of the state databases require fees for obtaining specific information. For example, the fee for accessing information regarding each organisation from the State Register Agency is 3,000 AMD (around 7 EUR),¹⁶⁷ which is burdensome for CSOs engaged in watchdog and monitoring activities.¹⁶⁸

The law also envisages the disclosure of information by the government. State agencies, regional administrations and LSGBs are required to publish information specified by law on their websites annually.¹⁶⁹ Armenia has ratified the Council of Europe Convention on Access to Official Documents, which sets out a strict framework for limitations on the right to information access and provides minimum standards to be applied in the processing of requests for access to official documents.¹⁷⁰ Although the Convention stipulates access to an expeditious and inexpensive review procedure, Armenia does not have an independent, specialised extrajudicial body to oversee the implementation of its access to information legislation and examine disputes in this field, while the court procedure does not set any contracted timelines for settling cases related to access to information.¹⁷¹

In August 2025, the government approved a legislative package which included new laws on Public Information, Cybersecurity and the Regulatory Body of Information Systems, along with amendments to related draft laws. In early October the package passed the first reading in the National Assembly.¹⁷² Among other purposes, the package is designed to strengthen the rules on data management by public bodies and regulate access to public information. Based on the new legislation, the state agencies will be required to proactively publish any data that is not considered secret, giving media outlets and civil society groups faster access to the information they need for

¹⁶⁵ RA Code on Administrative Offences, 6 December 1985, Article 189.7.

¹⁶⁶ RA Government Decision No. 1204-N "On setting the procedure of registration, classification and maintenance of information developed by or delivered to the information holder", 15 October 2015, last amended as of 28 November 2020 (in Armenian), <https://www.arlis.am/hy/acts/147567>.

¹⁶⁷ RA Law on State Duty, 27 December 1997, Article 20.

¹⁶⁸ It should be noted that mass media have been exempted from this fee since 2020.

¹⁶⁹ RA Law on Freedom of Information, 23 September 2003, Article 7.

¹⁷⁰ RA Law on Ratifying the Council of Europe Convention on Access to Official Documents, 23 March 2022 (in Armenian), <https://www.arlis.am/hy/acts/161489>.

¹⁷¹ See also Council of Europe, "Baseline Evaluation Report on the implementation of the Council of Europe Convention on access to official documents (CETS No. 205 Tromsø Convention) ARMENIA", 11 March 2025, <https://rm.coe.int/baseline-evaluation-report-armenia/1680b4ad1b>.

¹⁷² RA Law on Public Information, first reading, National Assembly of the Republic of Armenia (in Armenian), http://www.parliament.am/draftreading_docs8/K-1139-1_R1.pdf; RA Law on Cybersecurity, first reading, National Assembly of the Republic of Armenia (in Armenian), http://www.parliament.am/draftreading_docs8/K-1139_R1.pdf; RA Law on the Regulatory Body of Information Systems, first reading, National Assembly of the Republic of Armenia (in Armenian), http://www.parliament.am/draftreading_docs8/K-1139-2_R1.pdf. **Note:** The legislative package was fully adopted by the parliament on 4 December 2025 (after the CSO Meter 2025 reporting period).

reporting and monitoring. Further, the government plans to adopt relevant by-laws, in particular regarding the procedure and the scope of information disclosure as well as other procedures to support the implementation of the new legislation.¹⁷³ Before government approval, the draft package underwent several revisions that mainly addressed recommendations from CSOs and experts.¹⁷⁴ The package also amends the Law on State Secrecy to provide a more detailed definition of the concept of “*official information of limited distribution*” and to specify the cases where this concept cannot be applied.¹⁷⁵ While these changes may reduce the risks of discretionary interpretation, concerns about the inconsistent application of this concept remain.

On the other hand, given persisting practical challenges, the blanket rule on the proactive publication of data might not be effectively implemented in the near future. According to experts and CSOs, state bodies and municipalities fail to properly disclose the necessary information as required by the Law on Freedom to Information. In addition, the published information is usually in non-machine-readable PDF formats and does not comply with the principles of open data and accessibility. According to the monitoring of websites of 32 communities in five regions of Armenia by a CSO, even though most of the communities publish information on community development programmes, budget, local legal acts, services and property as required by law, there are several community websites that do not comply with these requirements. At the same time, most municipalities do not publish reports on the implementation of five-year and annual programs, information on the formation and meetings of consultative bodies or information on the procedure and results of public consultations.¹⁷⁶

As in previous reporting years, CSOs mention difficulties in obtaining responses to enquiries. Even though most state bodies provide responses to information requests, the responses might be delayed or incomplete or provide very general information without addressing the points raised. Often, CSOs need to follow-up by contacting the relevant institution to receive a response. CSOs note that local governments and regional government bodies are particularly unresponsive to enquiries, including due to technical problems, although this experience varies depending on the specific community.¹⁷⁷ There are cases where state bodies abuse the possibility to delay a response by 30 days without proper justification and reject the request in the final

¹⁷³ “The Action Plan of the Republic of Armenia for 2025-2027 within the framework of the ‘Open Government Partnership-Armenia’ initiative” (draft), *op. cit.*

¹⁷⁴ See more information at: CSO Meter, “Armenia takes next steps to improve management of public information and cybersecurity in digital public services”, 22 September 2025, <https://csometer.info/updates/armenia-takes-next-steps-improve-management-public-information-and-cybersecurity-digital>.

¹⁷⁵ RA Law on Amendments to the Law on State Secrecy, first reading, National Assembly of the Republic of Armenia (in Armenian), <http://www.parliament.am/drafts.php?sel=showdraft&DraftID=78882>.

¹⁷⁶ Electronic communication with Direct Democracy NGO, September 2025.

¹⁷⁷ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

response.¹⁷⁸ These issues are especially typical for law enforcement, military and judicial bodies, as well as regional and local self-government bodies, which might reject enquiries, delay or not provide responses at all.¹⁷⁹

Due to the court procedure's long duration and bureaucracy, the process of appealing the responses to information requests in court is considered ineffective. Even in cases of successful appeals, the information subsequently provided is often outdated or no longer relevant.¹⁸⁰

CSOs expect that the quality of published information will improve as the government takes steps to improve its official websites and sets standards for published information, as well as due to the new Law on Public Information. Currently, most state websites have been modernised. However, not all of them are fully functional and not all have accessibility features.¹⁸¹ After piloting the self-assessment methodology in the area of freedom of information in three governmental agencies in 2024, in 2025 the methodology was adopted by other state bodies. These state bodies conducted self-assessments and provided reports on the statistics of information requests in a unified format.¹⁸²

Standard IV: Participation in decision-making is distinct from political activities and lobbying.

CSOs are not restricted to engaging in public policy activities. At the same time, public organisations cannot set statutory objectives that are reserved for other organisational types, such as political parties.¹⁸³ The goals of political parties are defined as *“participation in referendums, elections of national and local government, and other forms of participation in public and state political life with the purpose of contributing to the formation and expression of the people’s political will”*.¹⁸⁴

There is no legislation on lobbying activities in Armenia. Based on the government’s Anti-Corruption Strategy and its 2023-2026 Action Plan, both of which envisage regulation on transparency in interactions with lobbyists through relevant legal

¹⁷⁸ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025; Freedom of Information Center of Armenia, “Blacklist 2025-Second quarter: Violations on Access to Information Right”, 8 July 2025, <https://foi.am/en/news-events/38720>

¹⁷⁹ Helsinki Citizens' Assembly-Vanadzor, “Observance of provisions under the RA Law on Freedom of Information by state organisations, territorial administration and local government bodies according to data obtained from information requests of HCA Vanadzor in 2024”, 25 March 2025 (in Armenian), <https://hcav.am/report-inf-25-03-2025/>.

¹⁸⁰ Law Development and Protection Foundation, “Fundamental Issues Pertaining to Freedom of Information in Armenia: Summary”, <https://ldpf.am/uploads/files/9500207ca102c1da986ffcbcd8863aaa.pdf>.

¹⁸¹ Information check with representatives of ‘Freedom of Information Center of Armenia’ and ‘Disability Rights Agenda’ NGOs, September 2025.

¹⁸² Information check with government representative, September 2025; Success Story 46. ATI Self-Assessment system, developed by FOICA, has been implemented in State Institutions, Freedom of Information Center of Armenia, 12 December 2024, <https://foi.am/en/success-stories/37415>.

¹⁸³ RA Law on Public Organisations, 16 December 2016, Article 3.

¹⁸⁴ RA Constitutional Law on Political Parties, 16 December 2016, last amended as of 1 April 2025, Article 2 (in Armenian), <https://www.arlis.am/hy/acts/204213>.

measures by the end of 2025,¹⁸⁵ the Ministry of Justice developed a draft package of legal amendments requiring public officials to report any oral or written, direct or mediated communication with individuals or legal entities aimed at law-making and the development of strategic documents. This requirement contains some exclusions, such as that public officials are not required to report communications during public consultations or communications that are related to the protection of rights by individuals or organisations.¹⁸⁶ In July 2025, the Ministry presented the proposed regulations to CSOs,¹⁸⁷ and further published the revised draft law on Public Service (covering only high-level government officials in the executive branch) for public consultation.¹⁸⁸ Experts generally view the proposed amendments as positive steps toward enhancing the transparency of lobbying, noting that they do not impose additional burdens on CSOs. However, the practical impact of the amendments remains to be seen. There are concerns that the new reporting obligations could make some officials more reluctant to engage with civil society or could discourage dialogue with CSOs to avoid publicity in cases involving sensitive issues (such as the rights of sexual minorities).¹⁸⁹

In practice, CSOs are free to engage in the policy-making process and in advocacy activities without the need for special status or registration. CSOs are not harassed or persecuted for their views supporting or contrary to the interests of political parties. However, on an individual level, people can be subject to hate speech and verbal attacks for their political views (see also Area 6: Freedom of Expression).

Specific recommendations in this Area are as follows:

- The National Assembly establishes mechanisms for mandatory public consultations on draft legislation produced by the members of the National Assembly and for CSO engagement in both the early stages of legal drafts and during the final revisions of the drafts received by the government (including through engagement at the level of Standing Committees);
- State bodies utilise and expand the pre-existing and new institutional mechanisms of participation to ensure meaningful participation, including through: (a) engaging CSOs in the early stages of policy development; (b) addressing the drawbacks of the e-draft platform and providing statistics on participation activities and the incorporation of comments on this platform; (c) providing sufficient time for

¹⁸⁵ Anti-Corruption Strategy of the Republic of Armenia, RA Ministry of Justice, <https://www.moj.am/en/page/583> (Appendix to the RA Government Decision No. 1871-L 'On approving the RA Anti-Corruption Strategy and the Deriving Plan of Actions for 2023-2026', 26 October 2023, <https://www.arlis.am/hy/acts/184674>).

¹⁸⁶ Information check with TIAC and LDPF experts.

¹⁸⁷ The Ministry of Justice has presented proposed regulations on lobbying activities, Ministry of Justice of the Republic of Armenia, 29 July 2025 (in Armenian), <https://moj.am/article/4428>.

¹⁸⁸ Draft Law "On Amendments to the Law on Public Service", Unified Website for Publication of Draft Legal Acts (in Armenian), <https://e-draft.am/projects/9275>.

¹⁸⁹ Meeting of CSO Meter Advisory Board, 31 October 2025; Information check with a CSO representative working in the area of minority rights, November 2025.

consultations and organising more frequent face-to-face consultations, including in the regions; and (d) considering and incorporating well-founded and evidence-based suggestions to the maximum possible extent;

- The government enhances CSO engagement in policy implementation and monitoring, including through sustained work of multi-stakeholder bodies and working groups, allocating budget to outsource monitoring to CSOs, and developing other institutional mechanisms to ensure public engagement after the adoption of laws, policies and strategies;
- The government and the National Assembly envisage legal consequences for non-implementation of the provisions related to public consultations and the activities of consultative bodies (e.g. the possibility to recognise a legal act as invalid);
- State bodies respond to CSO enquiries in a timely (as set by law) and comprehensive manner and ensure the timely publication and continuous updating of information on official websites;
- The government ensures the effective enforcement of the new Law on Public Information once it is adopted by: introducing clear implementing regulations; improving the technical capacity of state and local government bodies to proactively publish data; and ensuring that the disclosed information is timely, complete and available in open, machine-readable formats in line with open data principles;
- The government and the National Assembly provide further legislative measures to improve access to information through: establishing an extrajudicial independent body on access to information; setting contracted timeframes for examining cases pertaining to the protection of access to information to enable effective protection of this right; and removing the notion of “official information of limited distribution” from the Law on State Secrecy; and
- The Ministry of Justice provides free public access to the registry data available on the website of the State Register, as well as free public access to other databases managed by the state to promote public participation and oversight.

3.6 Freedom of Expression

Overall score per area: **4.7/7**

Legislation: **5.2/7**

Practice: **4.2/7**

The freedom of expression is guaranteed by Armenian legislation and can be restricted only by law for a narrow set of purposes. According to the law, media practitioners and journalists act freely based on principles of equality, lawfulness, freedom of expression and pluralism. Censorship, coercion, hindrance to professional activities and discrimination are all prohibited. Media organisations can implement their activities without registration and licensing, except for TV and

radio companies. Progress on long-discussed reforms to modernise the media framework based on the Memorandum of Collaboration signed in 2022 remains limited, with draft amendments aimed at improving media self-regulation mechanisms still pending. In 2025, the government proposed several draft amendments to media and civil legislation to update defamation rules, extend liability to online content and strengthen oversight of broadcasters.

Independent media faced sustainability challenges in 2025 due to the loss of external funding from U.S. sources, though this gap was further covered by the EU and other donor support. Meanwhile, the government established a foundation to support audiovisual broadcasters, a move that was criticised for excluding online media.

Journalists and media outlets operate in a highly polarised political climate marked by verbal attacks, smear campaigns and occasional physical harassment. Criminal charges for social media posts and public statements, with applications of the strictest enforcement measures, raised concerns about the use of criminal law to curb dissent. Hate speech legislation is perceived as selectively applied with enforcement often favouring state officials over vulnerable groups and critics. The hostile atmosphere has had a chilling effect on expression; many activists and CSOs resort to self-censorship to avoid attacks or accusations of political bias. On the other hand, civil society is criticised for remaining silent on sensitive issues.

The government continued measures to combat disinformation, including through: the creation of a Strategic Communication Department under the Prime Minister's Office; further activities towards increasing media literacy and training civil servants; and raising public awareness under the National Concept of the Struggle against Disinformation.

Due to the increasingly hostile environment for freedom of expression, including cases of criminal charges in response to public statements and opinions, the practice score in this area declined from 4.3 in 2024 to 4.2 in 2025, leading to a lower overall area score from 4.8 to 4.7. Key recommendations call on the government and public officials to uphold freedom of expression standards, foster a culture of open and respectful public dialogue and ensure responsible communication towards the media. Additional recommendations, carried over from previous reports, highlight the need for keeping structured and early-stage consultations with CSOs and media organisations on media-related legislation, a fair and proportionate approach to criminal cases involving hate speech and calls to violence without selective enforcement, and strengthened institutionalised efforts to counter disinformation with greater transparency, inclusiveness and accountability.

Standard I: Everyone has the right to the freedom of opinion and expression.

Armenian legislation guarantees everyone's right to the freedom of expression and opinion. According to the Constitution, everyone has the right to freedom of expression, including the freedom to seek, receive and impart information and ideas without interference from the state or LSGBs, irrespective of state borders. The freedom of expression may be restricted only by law to protect the fundamental rights and freedoms of public security, public order, health or morals or the dignity and reputation

and the rights and liberties of others. Freedom of the press, radio, television, and other means of information is also guaranteed.¹⁹⁰

According to the Law on Mass Media, media practitioners and journalists act freely on the basis of principles of equality, lawfulness, freedom of expression and pluralism. Censorship, coercion, hindrance to professional activities and discrimination are prohibited. The Law restricts the dissemination of information that is considered secret information or information advocating criminally-punishable acts, as well as information violating the right to privacy of one's personal or family life.¹⁹¹ Mass media bears responsibility for its publications in cases of using information from “*non-identified*” sources.¹⁹²

Media outlets are issued and distributed without prior or current state registration, licensing, declaration or notice to any state body.¹⁹³ The requirement for the licensing of mass media refers exclusively to radio and television companies. The Law on Audiovisual Media regulates the activities of broadcasting media, including their authorship, licensing, rights and responsibilities.¹⁹⁴

Based on the Memorandum of Collaboration between media organisations, the relevant National Assembly Standing Committee and the Ministry of Justice signed in 2022, a Concept on media legislation reforms is in development. However, the progress in implementing reforms has largely stalled.¹⁹⁵ Draft amendments to the RA Law on Mass Media and the RA Civil Code, discussed in 2023-2024 and aimed at harmonising Armenia's media framework with international standards and introducing self-regulation mechanisms to strengthen media integrity and accountability, had not been further processed by the government as of September 2025.¹⁹⁶ These regulations could partly address the current issues related to continuous violations of ethical and professional norms by a number of journalists and media outlets.¹⁹⁷

Although the country's rating has improved from 71.60 to 73.96 in the Index of Reporters Without Borders, according to this organisation's report, despite a pluralistic environment and free operation of media, Armenia's media environment continues to

¹⁹⁰ Constitution of the Republic of Armenia, 5 July 1995, amended on 6 December 2015, Article 42.

¹⁹¹ RA Law on Mass Media, 13 December 2003, last amended as of 21 June 2022, Article 7 (in Armenian), <https://www.arlis.am/hy/acts/164454>.

¹⁹² A “non-identified source” is defined by law as a domain registered on the internet, a web hosting site, or an account or channel on a website or application, whose owner identification information is absent, obviously false, or incomplete, which makes it impossible to identify the owner of the source.

¹⁹³ RA Law on Mass Media, 13 December 2003, Article 4.

¹⁹⁴ RA Law on Audiovisual Media, 16 July 2020, last amended as of 8 November 2025 (in Armenian), <https://www.arlis.am/hy/acts/215610>.

¹⁹⁵ Committee to Protect Freedom of Expression, “Quarterly report of CPFE on Situation with Freedom of Expression and Violations of Rights of Journalists and Media in Armenia (April-June, 2025)”, *Khosq.am*, 22 July 2025, <https://khosq.am/en/reports/quarterly-report-of-cpfe-on-situation-with-freedom-of-expression-and-violations-of-rights-of-journalists-and-media-in-armenia-april-june-2025/>.

¹⁹⁶ Interview conducted in the framework of CSO Meter research, September 2025.

¹⁹⁷ Committee to Protect Freedom of Expression, “Quarterly reports of CPFE on Situation with Freedom of Expression and Violations of Rights of Journalists and Media in Armenia”, *Khosq.am*, 2025, <https://khosq.am/en/reports/>.

be affected by political polarisation, smear campaigns against independent journalists and a lack of sustainability of independent outlets.¹⁹⁸ The stopping of U.S. foreign aid in January 2025 severely affected Armenian media, as many independent outlets and journalistic organisations lost crucial USAID support, forcing them to suspend projects and cut staff.¹⁹⁹ However, many of them were able to cover this gap later in the year due to support of other donors such as the European Endowment of Democracy and the EU.²⁰⁰

While the government did not initiate any prompt response to support independent online media in this critical situation, in April 2025 it established a foundation to support audiovisual content of public benefit by providing state-funded grants to licensed broadcasters of audiovisual programs operating in public multiplex, based on assessments of the content popularity.²⁰¹ Media organisations argued that this decision: (a) undermined the ongoing joint work to identify an optimal model of state support for the media sector; (b) introduced a discriminatory approach by limiting support to television broadcasters in the public multiplex while excluding online media; and (c) urged the government to suspend the implementation of the decision in favour of a more strategic and comprehensive approach to media development and state support.²⁰² Furthermore, in October 2025, the parliament approved amendments to the Law on Audiovisual Media to reduce the minimum number of public broadcasters through removing the requirement of an educational-cultural program.²⁰³ Media organisations criticised the initiative as unjustified and politically motivated, noting that it appeared to target the television channel of the Armenian Apostolic Church amid heightened political tensions between the Church and the government.²⁰⁴

In 2025, amid intense political polarisation and pre-election year tensions, journalists in Armenia continued to face harassment, verbal abuse and legal pressures. In a highly politicised media environment, the treatment of pro-government media by opposition

¹⁹⁸ Reporters Without Borders, Armenia (2025), <https://rsf.org/en/country/armenia>.

¹⁹⁹ Committee to Protect Freedom of Expression, "Quarterly report of CPFE on Situation with Freedom of Expression and Violations of Rights of Journalists and Media in Armenia (January-March, 2025)", *Khosq.am*, 23 April 2025, <https://khosq.am/en/reports/quarterly-report-of-cpfe-on-situation-with-freedom-of-expression-and-violations-of-rights-of-journalists-and-media-in-armenia-january-march-2025/>; Tigran Grigoryan, "The impact of U.S. aid cuts on Armenia's civil society and media", *CivilNet*, 17 March 2025, *op. cit.*

²⁰⁰ Meeting of CSO Meter Advisory Board, 31 October 2025; European Council, "Joint press release: EU and Armenia reaffirm and advance their partnership during a Leaders' meeting", 14 July 2025, <https://www.consilium.europa.eu/en/press/press-releases/2025/07/14/joint-press-release-eu-and-armenia-reaffirm-and-advance-their-partnership-during-a-leaders-meeting/>.

²⁰¹ RA Government Decision N 742-A "On establishing 'Public Benefit Media Environment' Foundation and approving the regulations of the Foundation", 17 April 2025 (in Armenian), <https://www.arlis.am/hy/acts/208028>

²⁰² Public Journalists' Club, "Statement by media organisations regarding the Government's decision to establish the 'Public Benefit Media Environment' Foundation", 22 April 2025 (in Armenian), <https://pjc.am/lragroghakan-kazmakerputyunneri-haytarutyune-karavarutyun-himnadram-steghtselu-oroshman-arnchutyamb>.

²⁰³ RA Law on Amendments to the RA Law on Audiovisual Media, 24 October 2025 (in Armenian), <https://www.arlis.am/hy/acts/215601>.

²⁰⁴ Committee to Protect Freedom of Expression, Statement by media organisations, 27 October 2025, <https://khosq.am/en/2025/10/27/statement-139/>.

politicians, as well as opposition media by government officials, is often hostile and sometimes escalates into open conflicts. Incidents of insulting and obstructing journalists by MPs went largely unaddressed, reinforcing a culture of impunity. Journalistic organisations repeatedly called for accountability mechanisms, such as a parliamentary ethics committee, but no effective steps were taken.²⁰⁵ Independent and investigative media also face public smear campaigns and verbal attacks by high-ranking officials, including accusations of bias, corruption and unprofessionalism. Such rhetoric has been widely condemned by media organisations as undermining media independence and the freedom of expression, which fostered a hostile environment for independent journalism. Recent examples include high-level officials publicly accusing Radio Liberty's Armenian Service of spreading fake news and bias, as well as the Mayor of Yerevan repeatedly insulting and discrediting investigative outlets in response to corruption-related reporting.²⁰⁶

Several cases of physical violence against journalists also occurred throughout the year. In September 2025, a journalist was attacked by a masked individual in the street, following threats and harassment from a senior municipality official after harshly criticising municipal officials on social media. The official received a reprimand by the Mayor of Yerevan and a criminal case was opened to investigate the attack.²⁰⁷ Another case of physical violence by officials was reported in April 2025, when the head of a Yerevan district and several men assaulted an activist and video blogger inside the district administration building. Although some of the assailants were briefly detained, the official himself avoided arrest despite video evidence of the incident.²⁰⁸

Amid escalating tensions between government officials and the Armenian Apostolic Church, several individuals, including clerics and human rights defenders, faced criminal charges or detention for social media publications or public statements on the grounds such as the defamation of judges, prosecutors or investigators and public calls to seize power or overthrow the constitutional order. In some cases, detention was later

²⁰⁵ Committee to Protect Freedom of Expression, Statement by media organisations, *Khosq.am*, 29 April 2025, <https://khosq.am/en/2025/04/29/statement-135/>; Committee to Protect Freedom of Expression, "Quarterly report of CPFE on Situation with Freedom of Expression and Violations of Rights of Journalists and Media in Armenia (April-June 2025)", *Khosq.am*, 22 July 2025, *op. cit.*; "Arshaluys Barseghyan, Armenian official hints at a crackdown on media in case there is no 'self-regulation'", OC Media, 5 May 2025, <https://oc-media.org/armenian-official-hints-at-a-crackdown-on-media-in-case-there-is-no-self-regulation/>.

²⁰⁶ Yerevan Press Club, "Statement Regarding the campaign organized against Radio Free Europe/Radio Liberty Armenian Service", 27 February 2025, <https://ypc.am/statements/february-27-2025/>; Gevorg Tosunyan, "'Media have become a garbage dump': Yerevan Mayor sues CivilNet", *CivilNet*, 19 December 2024, <https://www.civilnet.am/en/news/810097/media-have-become-a-garbage-dump-yerevan-mayor-sues-civilnet/>;

Committee to Protect Freedom of Expression, "Quarterly report of CPFE on Situation with Freedom of Expression and Violations of Rights of Journalists and Media in Armenia (July-September 2025)", *Khosq.am*, 22 October 2025, <https://khosq.am/en/reports/quarterly-report-of-cpfe-on-situation-with-freedom-of-expression-and-violations-of-rights-of-journalists-and-media-in-armenia-july-september-2025/>

²⁰⁷ Grisha Balasanyan, "Journalist Says He Was Attacked for Criticizing Yerevan Officials", *Hetq.am*, 16 September 2025, <https://hetq.am/en/article/176833>.

²⁰⁸ Susan Badalian, "Yerevan District Chief Not Detained After Beating Up Activist", *Azatoryun.am*, 30 April 2025, <https://www.azatoryun.am/a/33401327.html>.

replaced by milder coercive measures. A group of CSOs issued a joint statement denouncing such cases as politically motivated, highlighting that the use of criminal justice tools and the strictest coercive measures constitutes a disproportionate interference with human rights and warned that such practices create a dangerous precedent for silencing dissent.²⁰⁹ Concerns were also raised internationally. By way of example, the UN Special Rapporteur on Human Rights Defenders condemned the criminal charges against a lawyer who criticised the prosecution of clerics,²¹⁰ and a Member of the European Parliament urged Armenia to exercise caution when prosecuting individuals for their opinions, finding such practices unacceptable.²¹¹

Some CSOs and experts note that the hostile and polarised environment, combined with a limited culture of open and respectful debate, has a growing chilling effect on the freedom of expression. Many individuals and organisations resort to self-censorship to avoid online attacks, accusations of political bias or marginalisation within their own sector, while on the other hand civil society also faces criticism for remaining silent in cases of alleged human rights and democracy violations.²¹²

Standard II: The state facilitates and protects the freedom of opinion and expression.

The current legislation facilitates and protects the freedom of opinion and expression mostly in accordance with international law. The Law on Mass Media states that media practitioners and journalists are not obliged to disclose their sources of information, except in cases where there is a court decision in which there is disclosure aimed at uncovering serious crimes.²¹³ The confidentiality of the identities of whistleblowers is also protected by the Law on Whistleblowing.²¹⁴ A problematic provision in the Law on Mass Media is that it allows state bodies to terminate the accreditation of a journalist if

²⁰⁹ Protection of Rights Without Borders, Statement by CSOs, 18 October 2025 (in Armenian), <https://prwb.am/2025/10/18/haytararuthyun-2/>.

²¹⁰ The lawyer used offensive language addressed to investigators, prosecutors, and judges, which was qualified as violation of the Article 490 of RA Criminal Code (Publishing information that is defamatory or otherwise harmful to the rights and legitimate interests of a judge, prosecutor, investigator, etc.).

²¹¹ Mary Lawlor, UN Special Rapporteur for human rights defenders, Facebook post, 29 October 2025, <https://www.facebook.com/MaryLawlorHRDs/posts/pfbid02NrAYEi6FW7Q98wnZfX7puonTYm9FTPW5o8UxAe3FXSxhSjnuq1cqPtNSqbXeoYZBI>; News.am, “European Parliament member calls on Armenia to be cautious when prosecuting people for their opinions”, 28 October 2025, <https://news.am/eng/news/912171.html>.

²¹² Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025; Mariam Khalatyan, Arpi Manusyan, Sona Martirosyan, “What to do when the old activism doesn’t work: Radicalizing democracy”, *Socioscope*, 13 August 2025 (in Armenian), https://socioscope.am/wp-content/uploads/2025/08/Civil-Society-and-Transformation_Arm-1.pdf; Tigran Grigoryan, “Democracy Under Pressure: The Role of Civil Society in Armenia”, *CivilNet*, 12 November 2025, <https://www.civilnet.am/en/news/985834/democracy-under-pressure-the-role-of-civil-society-in-armenia/>.

²¹³ RA Law on Mass Media, 13 December 2003, Article 5.

²¹⁴ RA Law on Whistleblowing, 9 June 2017, last amended as of 1 January 2023 (in Armenian), <https://www.arlis.am/hy/acts/172131>.

they have violated the rules of procedure of that agency for the second time within a year.²¹⁵

Defamation and libel were decriminalised in Armenia in 2010. Defamation and libel, as well as maximum compensation rates, are regulated by the Civil Code of the Republic of Armenia, which sets compensation of up to 3 million AMD (around 6,800 EUR) for libel and 6 million AMD (around 13,700 EUR) for defamation. The Civil Code specifies that the court must consider the property of the defendant when defining the compensation amount.²¹⁶

In April 2025, the Ministry of Justice introduced a draft package amending the Civil Code and the Law on Mass Media to modernise outdated provisions on libel and defamation. The proposals extend liability to defamatory or libellous content published not only by media organisations but also by individuals on online platforms and allow applicants to request the removal of specific content in addition to existing remedies.²¹⁷ The draft, developed in response to a 2024 Constitutional Court ruling,²¹⁸ was subject to public discussions with CSOs and media experts, but remains under revision as of November 2025.

There are no reported cases of journalists convicted, or media sites raided by the police, to uncover sources of information. In 2025, no conventional or online media was blocked. Publications on the internet do not require special permission or compliance with specific administrative regulations applicable to traditional media.

According to a monitoring report by the Committee to Protect Freedom of Expression (CPFE), in January-September 2025, 45 lawsuits were filed against journalists and media outlets on the grounds of defamation and libel (compared to 35 lawsuits in the same period for 2024). Most of these lawsuits are filed by state bodies and high-ranking officials and, in contrast to the previous year, few officials tried to settle the dispute through extrajudicial bodies.²¹⁹

Hate speech is covered in the Armenian Criminal Code, although it is not explicitly defined. Article 329 imposes liability for any public speech aimed at inciting or promoting hatred, discrimination, intolerance or enmity against a person or group of persons on the grounds of their racial, national, ethnic or social origin, religion, political or other opinions or other circumstances of a personal or social nature, as well

²¹⁵ RA Law on Mass Media, 13 December 2003, Article 6.

²¹⁶ RA Civil Code, 5 May 1998, last amended as of 10 September 2024, Article 1087.1.

²¹⁷ Draft Laws "On amendments and additions to the Civil Code" and "On amendments and additions to the Law on Mass Media", Unified Website for Publication of Draft Legal Acts (in Armenian), <https://www.e-draft.am/projects/8612/about>.

²¹⁸ RA Constitutional Court Decision "On determining the issue of compliance of Article 1087.1, Part 8 of the Civil Code of the Republic of Armenia with the Constitution, based on the application of Artak Zeynalyan", 1 October 2024 (in Armenian), <https://www.arlis.am/hy/acts/198197>.

²¹⁹ Committee to Protect Freedom of Expression, "Quarterly report of CPFE on Situation with Freedom of Expression and Violations of Rights of Journalists and Media in Armenia (July-September 2025)", 22 October 2025, *op. cit.*

as for distributing materials or objects for that purpose. The sanctions range from a fine of 20,000 AMD (around 46 EUR) to up to four years' imprisonment in cases with aggravating conditions. Article 330 imposes liability for public calls to and public justification or preaching of violence, with sanctions ranging from a fine to up to three years' imprisonment in cases with aggravating conditions. For both articles, the aggravating conditions include cases in which the misconduct was committed by a group of persons with prior agreement, using official powers or influence or through public channels and/or communication technologies.²²⁰

As in previous years, high levels of misinformation, disinformation and hate speech in online and social media remain a concern, which has also been highlighted in reports by international organisations.²²¹ CSOs state that the legislation aimed at tackling hate speech and calls to violence is selectively applied and that law enforcement bodies tend to protect government officials rather than CSOs and social groups targeted by hate speech, harassment and defamation (these mostly include LGBTQ+ groups, environmental activists, ethnic Armenians displaced from the Nagorno-Karabakh region, human right defenders and journalists).²²² In November 2025, masked NSS officers arrested two bloggers on hooliganism charges after they made sexually explicit insults toward the Speaker of the National Assembly in response to the Speaker's own offensive remarks. The officers also seized the equipment used for their podcast and later the bloggers were placed in two months' pre-trial detention.²²³ While condemning blasphemy and insults in the public domain, media organisations found that the use of disproportionate force, the performative involvement of the NSS and the seizure of all editorial equipment was unacceptable and urged law enforcement agencies to refrain from a selective approach when prosecuting individuals for insults and blasphemy.²²⁴ A citizen was briefly arrested in February 2025 for alleged hate speech after criticising the police for it allowing a pro-Azerbaijani performance to take place in the centre of Yerevan, although his remarks were deemed by experts within the bounds of free expression. He was placed under administrative supervision, with restrictions imposed on his right to speak publicly; these restrictions were lifted by a court decision after a month.²²⁵ On the other hand, the law enforcement authorities did not proceed with

²²⁰ RA Criminal Code, 5 May 2021, Articles 329 and 330.

²²¹ Reporters Without Borders, Armenia (2025), *op. cit.*

²²² Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

²²³ Tatev Ghazaryan and Tigran Gigoryan, "Opposition Bloggers Detained in Armenia: Implications for Free Speech and Political Discourse", *CivilNet*, 20 November 2025, <https://www.civilnet.am/en/news/987597/opposition-bloggers-detained-in-armenia-implications-for-free-speech-and-political-discourse/>.

²²⁴ Committee to Protect Freedom of Expression, Yerevan Press Club, Media Initiatives Center, et al., "Statement by media organisations regarding the actions taken against AntiFake.am", *Hetq.am*, 14 November 2025 (in Armenian), <https://hetq.am/hy/article/178120>.

²²⁵ Gayane Saribekian, "Man Prosecuted After Exposing Pro-Azeri Celebration in Yerevan", *Azatutyun.am*, 3 February 2025, <https://www.azatutyun.am/a/33301492.html>; Naira Bulghadaryan, "After a month of silence, Gharib Babayan has the right to speak out", *Azatutyun.am*, 7 March 2025 (in Armenian), <https://www.azatutyun.am/a/mekamsya-lroutyouunits-heto-gharib-babayann-iravounk-ouni-artahaytvel/33339777.html>.

multiple claims related to hate speech by officials against Armenians from Nagorno Karabakh.²²⁶ A case filed by a CSO representative several years ago in relation to threats and an incitement to violence was closed in 2025 as the statute of limitations had expired.²²⁷

In August 2025, the Ministry of High-Tech Industry published for consultation draft amendments on the Law on Audiovisual Media, aiming to “*reduce information that negatively affects citizens and ensure the information sovereignty*” of the country. The draft amendments introduce a revised provision on the misuse of audiovisual programmes, prohibiting the dissemination of content aimed at overthrowing the constitutional order, inciting war, promoting violence or cruelty, inciting hatred or discrimination, spreading pornography, or calling for criminal acts. The draft amendments empower the authorised state body – the Commission on Television and Radio – to oversee compliance with the content rules and, in cases of serious violations, to require the termination of relevant broadcast.²²⁸ While acknowledging the need for mitigating measures in light of the hostile environment, inter alia the large volume of Kremlin propaganda and its interference in Armenia’s socio-political life ahead of elections, a freedom of expression expert noted that overly harsh measures carry serious risks of restricting free speech and should at minimum include interim sanctions, such as warnings.²²⁹ Generally, the draft tends to expand the powers of the Commission, and according to experts, if adopted, this body will be able to apply punitive actions based on political motives.²³⁰

One of the measures taken by the government to tackle misinformation and disinformation and provide a unified approach is the establishment of the Strategic Communication Department under the Prime Minister’s office in June 2025. The new department will coordinate government communication on a strategic level, develop relevant strategies and standards, oversee reform campaigns and lead efforts to counter disinformation.²³¹ This move was based on the commitment of the OGP Action Plan

²²⁶ Zhanna Avagyan, “Why and who is sponsoring the hate campaign against the people of Artsakh?” *CivilNet*, 10 April 2025 (in Armenian), <https://www.civilnet.am/news/944160/ինչու-և-նվ-է-հովանավորում-արցախցիներին-ստեղծված-արշավը/>.

²²⁷ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

²²⁸ Draft Law “On amendments and additions to the Law on Audiovisual Media”, Unified Website for Publication of Draft Legal Acts (in Armenian), <https://www.e-draft.am/projects/8982>.

²²⁹ Interview conducted in the framework of CSO Meter research, September 2025.

²³⁰ Committee to Protect Freedom of Expression, “Quarterly report of CPFE on Situation with Freedom of Expression and Violations of Rights of Journalists and Media in Armenia (July-September 2025)”, 22 October 2025, *op. cit.*

²³¹ RA Prime Minister’s Decree No. 536-L “On amendments and supplements to the Decree No. 564-L of the Prime Minister of the Republic of Armenia dated 25 May 2018”, 20 June 2025 (in Armenian), <https://www.arlis.am/hy/acts/208470>.

2022-2024 which was aimed at establishing a strategic communication architecture at state level.²³²

In parallel, the government continued activities in the framework of the National Concept of the Struggle against Disinformation 2024-2026,²³³ such as: taking steps towards improving media literacy; introducing the strategic communication educational program in higher education institutions; building capacities of state servants; and running public awareness campaigns in partnerships with private media companies.²³⁴

Specific recommendations in this Area are as follows:

- The government and public officials uphold freedom of expression standards, promote a culture of open and respectful public dialogue and ensure responsible communication toward the media, refraining from intolerance towards diverse or critical opinions as well as from statements that may incite hostility or undermine public trust in journalists and media;
- The government continues structured consultations with CSOs and media organisations on media-related legislation from early stages, ensuring the implementation of media reforms initiated under the 2022 Memorandum of Cooperation;
- Law enforcement bodies apply a fair, consistent and proportionate approach in treating criminal cases related to hate speech and calls to violence, avoiding selective application; and
- The government strengthens its efforts to combat disinformation through a more institutionalised approach under the new Department of Strategic Communication and ensure the full and effective implementation of the National Concept of the Struggle against Disinformation, with greater transparency, inclusiveness and accountability.

²³² RA Government Decision No. 1568-L “On approving the Open Government Partnership Action Plan of the Republic of Armenia for 2022-2024”, 6 October 2022.

²³³ RA Prime Minister’s Decree No. 1319-L “On approving the RA Concept on the Struggle Against Disinformation and Deriving Action Plan for 2024-2026”, 27 December 2023 (in Armenian), <https://www.arlis.am/hy/acts/187979>.

²³⁴ Public Relations and Information Center. “Report on the implementation of the ‘Action Plan for the Concept of Combating Disinformation for 2024-2026’ in 2024”. 16 January 2025 (in Armenian), provided in electronic communication by the representative of the government’s Public Relations and Information Center, September 2025.

3.7 Right to Privacy

Overall score per area: **4.8/7**

Legislation: **5.7/7**

Practice: **3.8/7**

Armenia's Constitution and related laws guarantee the right to privacy and personal data protection. The Law on Personal Data Protection broadly aligns with international standards, setting requirements for lawful, proportionate and transparent processing of personal data. The Personal Data Protection Agency (PDPA), operating under the Ministry of Justice, oversees compliance with personal data protection legislation, provides relevant guidance, and initiates administrative proceedings as needed. However, the PDPA's limited resources restrict its effectiveness, and reforms are planned to enhance its independence and capacity in line with European standards. In 2025, the government developed a concept for establishing an independent personal data protection body, which will provide basis for improving the legislation and practice in this area.

Draft package of the Law on Public Information and Law on Cybersecurity, along with amendments to the Law on the Protection of Personal Data, (pending parliament approval as of November 2025), links data protection more closely with the broader cybersecurity and information systems framework. In addition, the law assigns oversight of the technical and encryption standards to the new Regulatory Body of Information Systems.

In practice, weak enforcement and remedy mechanisms permit ongoing violations and create persistent challenges in ensuring that state institutions process personal data in full compliance with the law. Recent incidents of privacy breaches and leaked wiretaps have further underscored systemic gaps in protecting against unlawful data processing and have highlighted the absence of effective prevention and accountability mechanisms.

Amendments to the Law on Police in 2025 expanded police access to public surveillance cameras and enabled real-time facial recognition, while also granting municipalities access to police recordings without adequate safeguards. Combined with the lack of independent oversight and limited public trust in law enforcement, these provisions heighten risks of unlawful surveillance and interference with privacy.

Due to incidents of privacy violations and newly expanded police surveillance powers, both the Law and Practice scores in the Right to Privacy area declined compared to 2024 from 5.8 to 5.7 in Law and from 3.9 to 3.8 in Practice, resulting in a decrease of the overall area score from 4.9 to 4.8. The recommendations call for stronger safeguards against unlawful surveillance and privacy breaches, the establishment of independent oversight and transparent investigations of violations, and improved enforcement of personal data protection legislation. The report also recommends the revision of surveillance regulations to ensure full alignment with international standards and the implementation of effective accountability mechanisms for all authorised bodies.

Standard I: Everyone enjoys the right to privacy and data protection.

Armenian legislation guarantees the right to privacy and adequate protection against interference or attacks on privacy. The Constitution acknowledges the right of every person to the inviolability of their private and family life, honour and good reputation, which may be restricted only by law for a narrow list of purposes. These purposes include: (a) state security; (b) the economic welfare of the country; (c) preventing or disclosing crimes; (e) protecting the public order, health and morals, or the basic rights and freedoms of others.²³⁵ The Criminal Code sets out the liability for the use, realisation or disclosure of information which constitutes the personal or family secrets of a person without their consent, or the acquisition or storage of that information with the aim of using, realising or disclosing that information in violation of the manner established by law.²³⁶ However, the Civil Code does not provide for the compensation of non-material damage to persons suffering from the violation of the right to privacy in private relationships.²³⁷

A separate provision in the Constitution mentions the right to the protection of personal data. The processing of personal data shall be carried out in good faith, for the purpose prescribed by law, with the consent of the person concerned or without such consent in case there is another legitimate ground prescribed by law.²³⁸ The Law on the Protection of Personal Data regulates the procedure and the conditions for the handling of personal data and the procedure to exercise the oversight of this data by the state. According to the Law, the processing of personal data must pursue a legitimate aim and the means to achieve this aim must be appropriate, necessary and moderate.²³⁹ The Code on Administrative Offences sets out a number of administrative sanctions for violating the provisions of the Law on Personal Data Protection, including fines ranging from 50,000 up to 500,000 AMD (around 114-1,140 EUR) in cases where the violation is not subject to any criminal liability.²⁴⁰

The PDPA under the Ministry of Justice is authorised to oversee the implementation of the legal requirements for the protection of personal data, maintain a registry of organisations processing personal data and provide protection of the relevant rights. The PDPA provides consultations, initiates administrative proceedings on the basis of applications by citizens and provides opinions on the compatibility of laws and legal drafts on the principles of processing personal data. In addition, the PDPA organises

²³⁵ RA Constitution, 5 July 1995, amended on 6 December 2015, Article 31.

²³⁶ RA Criminal Code, 5 May 2021, Article 204.

²³⁷ Law Development and Protection Foundation, “Analysis of the judgements of the European Court of Human Rights finding violation of Article 8 of the ECHR”, 2022 (in Armenian), <https://ldpf.am/uploads/files/d70768ed98487c0018d16b3639493d04.pdf>.

²³⁸ RA Constitution, 5 July 1995, amended on 6 December 2015, Article 34.

²³⁹ RA Law on the Protection of Personal Data, 18 May 2015, last amended as of 13 October 2023, Article 5 (in Armenian), <https://www.arlis.am/hy/acts/183134>.

²⁴⁰ RA Code on Administrative Offences, 6 December 1985, Article 189.17.

training sessions and events to raise awareness and publishes guides and information materials for citizens on how to best protect their privacy.²⁴¹ In 2025, the government prepared a concept for the creation of a new independent authorised body for the protection of personal data to enable improved legislation and practices in this area, as well as to comply with international obligations.²⁴²

The PDPA is mandated to initiate proceedings on the basis of claims and reports. According to its latest annual report, in 2024, the PDPA examined approx. 50 cases and imposed over a dozen administrative penalties for the violation of personal data protection provisions.²⁴³ Generally, the capacity of this agency remains limited and the current reforms on the protection of personal data are expected to strengthen the independence and the resources of the PDPA, in line with the government's commitment to implementing European standards and the visa liberalisation process.²⁴⁴

Although the Law on the Protection of Personal Data contains enabling provisions in line with international law, its enforcement and remedy mechanisms are weak. Consequently, in practice, these provisions are hardly met and instances of violations continue to occur. There are systemic challenges in ensuring that the processing of personal data complies with the relevant legal requirements, particularly in guaranteeing that state bodies operate on a proper and lawful basis when collecting or using such data, e.g. in cases of including personal data in the publication of the decisions of local governments and court decisions.

One of the legislative developments in the area were the draft amendments to the Law on the Protection of Personal Data included in the draft package of new laws on Public Information, Cybersecurity and the Regulatory Body of Information Systems. According to the draft, the technical requirements and the security regulations for processing personal data in information systems will be approved by the Regulatory Body of Information Systems under government procedures. The new body will also oversee compliance with the encryption requirements for protecting personal data in information systems, covering service providers under the Law on Cybersecurity and data managers under the Law on Public Information.²⁴⁵

²⁴¹ See the Personal Data Protection Agency, "Public Activity Report on 2024 of the PDPA", (in Armenian), <https://www.pdpa.am/public/uploads/REPORT-2024.pdf>.

²⁴² The Office of the Prime Minister of the Republic of Armenia, "The Prime Minister chairs meeting to discuss the process of reforms in the personal data protection system", 31 October 2025, <https://www.primeminister.am/en/press-release/item/2025/10/31/Nikol-Pashinyan-meeting/>.

²⁴³ The Personal Data Protection Agency, "Public Activity Report on 2024 of the PDPA", *op. cit.*

²⁴⁴ Interview conducted in the framework of CSO Meter research, August 2025; The Personal Data Protection Agency, "Issues related to the implementation of European standards for personal data protection were discussed", 25 February 2025 (in Armenian), <https://www.pdpa.am/hy/post/view/58>.

²⁴⁵ RA Law on Amendments to the Law on the Protection of Personal Data, first reading, National Assembly of the Republic of Armenia (in Armenian), <http://www.parliament.am/drafts.php?sel=showdraft&DraftID=78886>

In practice, the breaches of privacy and unlawful processing of personal data remain widespread in Armenia. In October 2025, a case of an online publication of intimate recordings from video surveillance inside a private apartment, allegedly involving an archbishop, revealed the systemic risks to privacy and underscored the lack of effective state mechanisms to prevent and subsequently investigate such intrusions.²⁴⁶ The Human Rights Defender of Armenia condemned the incident as a serious violation of the right to private life and the protection of personal data, emphasising that the state is responsible for developing preventive mechanisms and for holding individuals accountable in such cases.²⁴⁷ Shortly thereafter, the Prosecutor's Office initiated proceedings on the case.²⁴⁸ However, amid escalating government-church tensions, the leak was widely perceived as originating from government-linked sources, raising concerns about possible state involvement or at least negligence in preventing unlawful surveillance. These concerns were amplified by a broader pattern of recent surveillance leaks which were disseminated through online media and subsequently used as grounds for criminal proceedings, including the arrest of clergymen and opposition supporters.²⁴⁹ These instances together reinforced allegations about the politically motivated misuse of surveillance tools.²⁵⁰

Standard II: The state protects the right to privacy of CSOs and associated individuals.

The legislation complies with the right to privacy of CSOs. However, there are concerns with its implementation in practice.

The reporting requirements for public organisations and foundations do not contain any provisions on disclosing the names of their staff, except for the executive head. The reporting form for foundations also requires the publication of the names of the founders and members of the Board of Trustees, if they received any assets and services from the foundation during the reporting year.²⁵¹

The Law on Police sets out regulations on the use of surveillance technologies to ensure the proper notification on the use of such equipment and the protection of personal

²⁴⁶ DP Hub, "New risks of violating the right to privacy and personal data protection: the issue of secret video surveillance in private space and the dissemination of video recordings" (in Armenian), <https://dphub.am/archives/532>.

²⁴⁷ Human Rights Defender of the Republic of Armenia, "Statement: Human Rights Defender Anahit Manasyan considers widespread violations of the rights to privacy and personal data protection unacceptable", 25 October 2025 (in Armenian), <https://ombuds.am/am/site/ViewNews/3558>.

²⁴⁸ Hambardzumyan, Yevgenya, "The Prosecutor's Office has initiated a report on the videos attributed to Archbishop Arshak Khachatryan", *Factor.am* 27 October 2025 (in Armenian), <https://factor.am/945320.html>.

²⁴⁹ Shushan Stepanyan, "The origins of the scandalous wiretapping: what scheme is used?" *CivilNet*, 25 October 2025 (in Armenian), <https://www.civilnet.am/news/982111/սկանդալային-զաղտնալսումների-սկզբնաղբյուրները-ի՞նչ-սխեմա-է-օգտագործվում/>.

²⁵⁰ Tigran Grigoryan, "Big Brother is Watching You: Surveillance, Leaks, and Democratic Backsliding", *CivilNet*, 27 October 2025, <https://www.civilnet.am/en/news/982251/big-brother-is-watching-you-surveillance-leaks-and-democratic-backsliding/>.

²⁵¹ RA Law on Foundations, 26 December 2002, Article 39.

information. The warning signs must be visible about stationary video and photo equipment placed in public places. When using mobile equipment, the police officers must transport it in a visible manner, except in cases when surveillance is being conducted for special investigative purposes. The resulting videos or photos may be used: (a) to investigate crimes or violations of public order; (b) to investigate complaints about officers' actions; (c) to promote the protection of individuals' rights and legitimate interests; or (d) to publicise the case of a disciplinary violation or its absence by a police officer after the completion of an investigation, without disclosing or only minimally identifying other persons' identities. The use of videos or photos by the police for other purposes (including publishing) is prohibited. The list of police officers having access to the archive and the procedure for using the data is defined by the Order from the Chief of Police.²⁵² Although the law prohibits police officers from using personal technical means, according to CSO reports from previous years, during protests some police officers were filming demonstrators with their mobile phones, which raised concerns about the possibility of further unlawful processing of personal data and lack of relevant accountability measures.²⁵³

The police officers can use facial recognition systems in real time to verify the similarity of a citizen to the person wanted for an alleged crime. At the same time, the law states that the image of the persons in the view of the equipment cannot be recorded, saved or processed in any other way.²⁵⁴

In March 2025, the National Assembly adopted amendments to the Law on Police, the Law on Electronic Communications and related laws, aiming to combat street crime. These amendments authorise police to access and request recordings from surveillance systems installed in public spaces, including exterior of government or community buildings, airports, border checkpoints, parking areas, and public transport.²⁵⁵ According to the MP who proposed the draft, the cameras will be connected to the police systems, enabling the use of facial recognition to identify individuals committing offenses, for example in cases where they are littering the street.²⁵⁶ Given the limited public trust towards the police and the lack of independent oversight of law enforcement bodies, such a broad interpretation raises risks of unlawful surveillance

²⁵² RA Law on Police, 16 April 2001, Article 22.

²⁵³ Armenian Center for Political Rights, Helsinki Committee of Armenia, "Ad Hoc Report on the June 12th rally near the National Assembly in Yerevan and the actions of the police" 20 June 2024, Yerevan, https://armhels.com/wp-content/uploads/2024/06/Joint_Ad_Hoc_Report_HCA_ACPR_20.06.2024_eng.pdf.

²⁵⁴ RA Law on Police, 16 April 2001, Article 22.

²⁵⁵ Amendments to the RA Law on Police, 5 March 2025.

²⁵⁶ National Assembly of the Republic of Armenia, Legislative package debated in first reading: "Police to be given access to video recording devices of state structures", 11 February 2025, http://parliament.am/news.php?cat_id=2&NewsID=21726&year=2025&month=2&day=11&lang=eng; Factor TV, "Those who litter on the street will be identified through cameras and an administrative offense will be filed", YouTube Video, 4 March 2025 (in Armenian), *op. cit.*

and interference with the private lives of citizens.²⁵⁷ Moreover, before the final vote, an additional provision was introduced in the law granting local self-government bodies mutual access to the police recordings of cameras installed in their communities. In the absence of proper safeguards in the regulations on local self-government, such as logging, safe data processing and narrow defined purposes (as set for the police), this provision raises serious concerns for the protection of the right to privacy.²⁵⁸

Searches of the premises of CSOs or surveillance of their communications can only be carried out based on a court decision, except in urgent cases when a delay may lead to actions of terrorism or threaten state security. In such cases, the National Security Service (NSS) can carry out surveillance within a 48-hour period before a court decision is secured.²⁵⁹

In practice, experts and CSOs are doubtful about the legitimate use of surveillance powers by the NSS and law enforcement bodies as there are no oversight and accountability mechanisms for surveillance activities that are currently in place or transparent investigations of data leaks. There were no reported cases of law enforcement breaking into the premises of CSOs or accessing the documents of CSOs without due judicial authorisation during the reporting period.

Specific recommendations in this Area are as follows:

- The government introduces stronger safeguards against unlawful surveillance and breaches of privacy, ensuring independent oversight and transparent investigations of violations.
- The government strengthens the enforcement of personal data protection laws by ensuring that the data collection and processing by state bodies are justified and strictly comply with legal requirements, are supported by clear accountability and remedy mechanisms, and are overseen by the new independent personal data protection authority in line with the respective international standards.
- The Ministry of Internal Affairs and the National Assembly revise the new regulations on surveillance in the Law on Police to align them with international standards, ensuring a narrowly defined scope of lawful purposes and effective safeguards for accountability and lawful use by all authorised bodies.

²⁵⁷ Interviews and focus group discussions conducted in the framework of CSO Meter research, August- September 2025; Armenian Center for Political Rights, “‘Big Brother’ in Armenia: Report on a new law authorizing remote biometric surveillance by the Ministry of Internal Affairs”, 3 May 2025, *op. cit.*

²⁵⁸ Interview conducted in the framework of CSO Meter research, August 2025.

²⁵⁹ RA Law on Operational Intelligence, 22 October 2007, last amended as of 1 August 2025, Articles 32 and 34 (in Armenian), <https://www.arlis.am/hy/acts/209915>.

3.8 State Duty to Protect

Overall score per area: **4.5/7**

Legislation: **5.2/7**

Practice: **3.8/7**

Armenian legislation provides legal guarantees for the protection of CSOs and their beneficiaries, including access to domestic and international courts. However, in practice, the protection of CSOs and their affiliated persons by law enforcement is not sufficient. As in previous years, CSOs working in sensitive areas continue to face harassment and threats, while environmental activists faced new SLAPPs lawsuits in 2025.

CSOs are provided with legal mechanisms to present public interests in the courts on environmental issues and on the rights of people with disabilities. However, several complex preconditions significantly limit the exercise of this right in practice, particularly in environment-related lawsuits. Throughout 2025, CSOs continued discussions around extending the public standing in courts to ensure the extension of this right to a wider range of public interest areas beyond environmental and disability issues.

CSOs are increasingly aware of the requirement to declare the UBOs of legal entities. However, the purpose of this declaration and the relevant administrative and financial costs continue to create confusion and burden.

The scores in the area of State Duty to Protect have not changed from 2024. The recommendations of the previous CSO Meter report remain relevant, including those which recommended extending the right of CSOs to present public interest cases in the courts, dismissing the fees for updating the data of UBOs and providing more effective protection of CSOs, including through anti-SLAPP measures.

Standard I: The state protects CSOs and individuals associated with CSOs from interference and attacks.

According to the law, the state ensures the protection of the rights and lawful interests of public organisations.²⁶⁰ In accordance with its charter objectives, a public organisation has the right to represent and defend the rights and lawful interests of its members, beneficiaries and volunteers in other organisations in the courts, state bodies and LSGBs.²⁶¹ A foundation also has the right to act as a claimant or defendant in court.²⁶² The Administrative Procedure Code states that each individual or legal entity has the right to apply to the administrative court if they consider that their rights and freedoms have been violated or may directly be violated by the state or local government body, including when they have encountered impediments to exercise

²⁶⁰ RA Law on Public Organisations, 16 December 2016, Article 9.

²⁶¹ *Id.*, Article 16.

²⁶² RA Law on Foundations, 26 December 2002, Article 3.

these rights and freedoms or have not been provided with the necessary conditions to do so.²⁶³ This includes decisions on the registration of organisations and, when registration is rejected, founders can appeal this decision in the administrative court within two months.²⁶⁴ Decisions of the administrative court can be appealed to the courts of appeal and then to the Court of Cassation. Mechanisms of international legal protection for the right to the freedom of association are available for members and founders of CSOs via UN treaty bodies and the European Court of Human Rights.

Public organisations can present public interest cases in court on matters of environmental protection and disability rights, provided the organisation applying to the court complies with various requirements. In the case of environmental issues, the application should be based on the goals of the organisation as defined in its charter. Besides, the applicant should either have participated in public consultations related to the disputed issue or presented evidence that it had not been given a chance to participate in such public consultations. Finally, the applicant should have been active in the environmental protection area for at least two years before filing the application.²⁶⁵ These requirements are considered complicated (such as the requirement to present evidence that the organisation has participated in or was not able to participate in the relevant consultations) and so restrict the practical implementation of this right. By way of example, following a lengthy campaign, environmental organisations were only able to proceed with their lawsuits in 2022 as a result of a decision by the Court of Appeal.²⁶⁶

The requirement to have the respective goals in the charter of the organisation also applies when a CSO is seeking to represent the rights of persons with disabilities, as does the requirement to have been active in the field for at least two years prior to the lawsuit. Additionally, a simple majority of the members of the organisation need to be persons with disabilities.²⁶⁷

The Action Plan for 2023-2025 of the National Strategy on Human Rights Protection sets out that the right of public organisations to appeal to the court on issues of public importance will be expanded and will consider the principle of *actio popularis* (i.e. any member of the public is able to bring a lawsuit or legal action to enforce a public right or address a harm to the community).²⁶⁸ In 2024-2025, in the framework of the CSO Meter project, the Law Development and Protection Foundation initiated discussions

²⁶³ RA Administrative Procedure Code, 5 December 2013, Article 3.

²⁶⁴ *Id.*, Article 72.

²⁶⁵ RA Law on Public Organisations, 16 December 2016, Article 16.

²⁶⁶ TIAC, ECNL. "CSO METER: A compass to conducive environment and CSO empowerment. Armenia 2022 Country Report". CSO Meter, 2023, https://csometer.info/sites/default/files/2023-10/2022%20Armenia%20CSO%20Meter%20Country%20Report%20ENG_0.pdf.

²⁶⁷ RA Administrative Procedure Code, 5 December 2013, Article 216.6.

²⁶⁸ RA Government Decision No. 1978-L "On approval of the National Strategy for Human Rights Protection and Deriving Action Plans For 2020-2022 and 2023-2025", 26 December 2019, last amended on 12 April 2024 (in Armenian), <https://www.arlis.am/hy/acts/191790>.

around the issues and needs related to the implementation of *actio popularis*. Based on the proposals of CSOs, in March 2025, several MPs introduced draft amendments to the Law on Public Organisations²⁶⁹ and the Administrative Procedure Code,²⁷⁰ dismissing the requirement of prior participation in public discussions that was set for court applications on environmental issues. In addition, the proposed amendments expanded the standing of public organisations in discrimination cases beyond protecting the rights of persons with disabilities to include grounds such as sex, race, language, religion and other personal or social circumstances. While welcoming these progressive steps, CSOs suggested that the grounds should be further expanded to include the areas of public interest litigation, including inter alia areas such as the preservation of cultural and history values, the protection of consumer rights, election violations, and state and community property.²⁷¹ In addition, there is a need to extend the standing in the court in public interest issues to foundations and explicitly to affirm the right of CSOs to challenge the legality of normative legal acts, which would thereby strengthen public oversight mechanisms.²⁷² However, despite the strategy commitment, there has been no progress in the adoption of these respective legislative amendments.

In recent years, CSOs and associated persons have been repeatedly subjected to harassment, hate speech, and attacks by third-party organisations and groups. Most often, it is organisations working in the areas of LGBTQ+ rights, environmental activism or watchdog activities that face threats and harassment from third parties, but do not receive sufficient protection by law enforcement.²⁷³ Moreover, state officials and political actors have increasingly targeted watchdog and environmental activists in their public statements and social media posts. For example, on the occasion of the restart of the long-contested Amulsar mining project, which had been halted for years due to sustained activist protests, the Minister of the Economy wrote on his official account: “*The dogs bark, but the caravan moves on*”.²⁷⁴ Following criticism of the wording and questions about to whom he was referring, the Minister claimed that the remark was aimed at former officials and later removed the post. Such rhetoric is part of a broader trend of stigmatising independent CSOs and activists. For example, according to experts, in some instances, particularly when facing criticism of CSOs, officials and pro-government media label CSOs as “*Russian agents*” (a term that has replaced the

²⁶⁹ RA Law on Amendments and Supplements to the Law on Public Organisations, draft, National Assembly of the Republic of Armenia, <http://www.parliament.am/drafts.php?sel=showdraft&DraftID=77221>.

²⁷⁰ RA Law on Amendments and Supplements to the Administrative Procedure Code, draft, National Assembly of the Republic of Armenia, <http://parliament.am/drafts.php?sel=showdraft&DraftID=77226>.

²⁷¹ Law Development and Protection Foundation, “Problems of Implementation of ‘Actio Popularis’ in the Republic of Armenia”, 2025 (in Armenian), <https://ldpf.am/uploads/files/dd90febff575d1a778cb27b1f0b05fa2.pdf>.

²⁷² See more information at: CSO Meter, “Armenia to expand CSOs’ role in public interest litigation”, 12 May 2025, <https://csmeter.info/updates/armenia-expand-csos-role-public-interest-litigation>.

²⁷³ Focus group discussions conducted in the framework of CSO Meter research, September 2025.

²⁷⁴ Factor TV, “‘The dog barks, the caravan moves on’. Papoyan and Avinyan in the same rhetoric”, YouTube Video, 4 March 2025 (in Armenian), <https://www.youtube.com/watch?v=FT5uJiDP3Oo>.

previously common “*Sorosakan*”), thereby fuelling disinformation and harassment campaigns. These practices encourage self-censorship among activists and undermine the reputations of CSOs and their fundraising capacity.²⁷⁵

The court processes initiated by mining companies against environmental activists (mostly on the grounds of defamation and insult) continued.²⁷⁶ In 2025, a mining company filed a court case against an ecological CSO activist and lawyer, demanding 1 million AMD (around 2,300 EUR) in compensation for alleged harm to its business reputation and seeking retraction of statements made during public hearings.²⁷⁷ In May 2025, Armenia’s largest mining company filed a lawsuit against eight dismissed workers, with courts freezing their assets based on this demand (see also Area 5: Right to Participation in Decision-Making).²⁷⁸ The lawsuit came after the employees had themselves sued the company, demanding reinstatement following their dismissal for participating in a strike over fair wages, safety and environmental safeguards.²⁷⁹ Numerous CSOs and international organisations condemned the lawsuit as punitive and disproportionate, raising questions about possible government complicity in silencing dissent (based on ZCMC’s partial state ownership).²⁸⁰ Court hearings on ZCMC’s lawsuit against the workers remain ongoing.

According to a CSO database, at least 33 SLAPP cases were reported in the past seven years, initiated by mining and construction companies.²⁸¹ Such lawsuits are often aimed at silencing activists and deterring others from speaking out against rights abuses, through imposing a significant financial and psychological burden on the activists. Armenia is a member of the Council of Europe and therefore the government is obliged to follow the recommendations of the Council made in April 2024 on countering the use of SLAPPs.²⁸² At a recent meeting of the Extractive Industries Transparency

²⁷⁵ Interviews conducted in the framework of CSO Meter research, August-September 2025.

²⁷⁶ Defamation and insult are regulated by the RA Civil Code, which sets compensation of up to 3 million AMD (around 6,829 EUR) for insult and 6 million AMD (around 13,659 EUR) for defamation. The Civil Code stipulates that the court must consider the property of the defendant when defining the compensation amount (see: RA Civil Code, 5 May 1998, last amended as of 10 September 2024, Article 1087.1).

²⁷⁷ EcoLur, “Director of ‘META GOLD’ LLC Sues Director of ‘Armenian Forests’ NGO Nazeli Vardanyan, Demanding Retraction”, 20 August 2025, <https://www.ecolur.org/en/news/mining/16112/>

²⁷⁸ Arshaluys Bareghyan, “Zangezur mine demands \$12 million from eight fired workers over strike”, OC Media, 26 May 2025,

<https://oc-media.org/zangezur-mine-demands-12-million-from-eight-fired-workers-over-strike/>.

²⁷⁹ Marine Martirosyan, “8 dismissed employees of ZCMC have applied to court for reinstatement”, *Hetq.am*, 29 April 2025 (in Armenian), <https://hetq.am/hy/article/174091>.

²⁸⁰ Transparency International Anticorruption Center, “CSOs Condemn Legal Harassment by ZCMC Against Its Former Employees”, 4 June 2025, <https://transparency.am/en/media/news/article/5322>; Coalition for Human Rights in Development, “Civil society groups condemn ZCMC’s retaliation against eight workers, who went on strike to demand better labour conditions and environmental protection”, 10 June 2025, <https://rightsinddevelopment.org/news/armenia-zcmc-mining-workers-reprisals/>.

²⁸¹ Green Armenia, “List of Civil Lawsuits Filed Against Citizens by Mining and Construction Companies”, https://www.green-armenia.org/storage/exel/1760612625_SLAPP_Cases_Database_Armenia_25.09.2025.pdf

²⁸² Council of Europe Committee of Ministers, “Recommendation CM/Rec(2024)2 of the Committee of Ministers to member States on countering the use of strategic lawsuits against public participation (SLAPPs)”, 5 April 2024, <https://rm.coe.int/0900001680af2805>.

Initiative (EITI) Multi-Stakeholder Forum, government officials discussed SLAPP-related issues with civil society and business representatives, reaching preliminary agreements to continue the dialogue and tasking the Ministry of Justice with examining potential SLAPP cases and exploring legislative solutions based on international practice.²⁸³

The Criminal Code specifies hatred, intolerance or hostility based on racial, national, ethnic or social origin, religion, political or other views, or other personal or social circumstances as an aggravating condition for several offences.²⁸⁴ The law does not specifically include sexual orientation and gender identity as a basis for additional protection. The draft Law on Ensuring Equality and Protection Against Discrimination, developed by the Ministry of Justice and discussed with CSOs in 2024,²⁸⁵ is still being revised by the government.²⁸⁶ This draft package aimed to address discrimination and establish a Council on Discrimination Issues to ensure protection from any type of discrimination, but failed to identify sexual orientation, gender identity, health conditions or family status in the list of protected grounds, despite recommendations from CSOs and international organisations to do so.²⁸⁷ The adoption of the Law will be a significant step forward towards the protection against discrimination and will improve the legal environment for CSOs working to protect people from discrimination.

The Constitution envisages principles of proportionality and certainty that are applicable to all restrictions on fundamental rights and freedoms and allows the temporary suspension or restriction of specific rights and freedoms under a state of emergency or martial law.²⁸⁸ There was no state of emergency or martial law in Armenia in 2025.

Standard II: Measures used to fight extremism, terrorism, money laundering or corruption are targeted and proportionate, in line with the risk-based approach, and respect human rights standards on association, assembly and expression.

Armenian legislation provides targeted, proportionate regulations for fighting terrorism, money laundering and corruption in line with the risk-based approach. The Law on Combating Money Laundering and Terrorism Financing requires reporting

²⁸³ Minutes N 17 of the meeting of the RA Extractive Industries Transparency Initiative Multi-Stakeholder Forum, 30 October 2025 (in Armenian), https://www.eiti.am/file_manager/EITI%20Documents/Minutes/30102025-msg-meeting-minutes.pdf.

²⁸⁴ RA Criminal Code, 5 May 2021.

²⁸⁵ A package of the draft law of the Republic of Armenia 'On Ensuring Equality and Protection Against Discrimination' and related laws, Unified Website for Publication of Draft Legal Acts (in Armenian), <https://www.e-draft.am/projects/7408/about>.

²⁸⁶ Information provided on 26 September 2025 by the Ministry of Justice in response to an inquiry by CSO Hub member.

²⁸⁷ See more at: CSO Meter, "Armenia: New draft law on antidiscrimination is now open to public discussion", 31 July 2024, <https://csometer.info/updates/armenia-new-draft-law-antidiscrimination-now-open-public-discussion>.

²⁸⁸ RA Constitution, 5 July 1995, amended on 6 December 2015, Articles 76-79.

entities (such as banks, credit organisations, notaries and the State Register Agency) to carry out customer due diligence, introduce risk management procedures that identify and evaluate potential or existing risks and ensure that adequate measures are taken and report any relevant risks that are identified to the state-authorized body.²⁸⁹ In 2025, CSOs reported increasing difficulties in opening bank accounts because banks required extensive documentation, including grant contracts, donor lists and detailed information on organisational activities and upcoming projects and, in some cases, refused to open accounts altogether. In addition, some CSOs with existing bank accounts reported difficulties in obtaining the necessary approval to set up direct online donation options on their websites.²⁹⁰ These challenges stem not from changes in the AML/CFT regulatory framework, but rather from stricter internal compliance procedures introduced by banks in response to the global banking environment and international transaction restrictions in light of geopolitical context.²⁹¹

All legal persons, including non-profit organisations, are required to register their UBOs.²⁹² The sanctions for the failure to report or for non-compliance with the reporting procedures for UBOs include warnings and fines from 30,000 to 100,000 AMD (around 68 to 228 EUR),²⁹³ up to the involuntary dissolution of the organisation by court decision in cases where the relevant legal entity has not declared its UBOs for over three years.²⁹⁴ As in previous years, some CSOs continue to find the term “*real beneficiaries*” confusing (this term is used in Armenian legislation to denote the concept of beneficial owners). Most CSOs which participated in the CSO Meter interviews and focus group discussions had reported the executive heads of their organisations as the UBO. However, these CSOs consider the requirement of UBO declaration a formality as the executive heads are in any case registered in official documentation.²⁹⁵ Although the declaration of UBOs and the confirmation of UBO data in the beginning of each year is free of charge, organisations have to pay 10,000 AMD (around 23 EUR) each time for registering changes to the data of UBOs (such as names, addresses or passport information). This is a disproportionate burden for CSOs, especially considering that the same changes (relating to an executive head) are also required to be reported in the CSO’s registration documentation for a fee of 5,000 AMD (around 11 EUR). This means

²⁸⁹ RA Law on Combating Money Laundering and Terrorism Financing, 26 May 2008, last amended as of 8 August 2025 (in Armenian), <https://www.arlis.am/hy/acts/210014>.

²⁹⁰ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

²⁹¹ Information check with the representative of Central Bank of Armenia, September 2025.

²⁹² RA Law on State Registration of Legal Entities, Separate Subdivisions of Legal Entities, Institutions and Private Entrepreneurs, 3 April 2001, Chapter 12.1.

²⁹³ RA Code on Administrative Offences, 6 December 1985, Article 169.29.

²⁹⁴ RA Law on State Registration of Legal Entities, Separate Subdivisions of Legal Entities, Institutions and Private Entrepreneurs, 3 April 2001, Article 60.5.

²⁹⁵ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

that CSOs have to effectively make double payments for registering the same information.²⁹⁶

Specific recommendations in this Area are as follows:

- The National Assembly makes the necessary legislative changes to expand the possibilities for CSOs to represent public interests in the courts on cases within the scope of their goals and ensures that they can use this right in practice by alleviating any excessive requirements and related bureaucratic procedures;
- The state provides adequate protection for CSOs, including through: (a) adopting anti-discrimination laws and establishing an anti-discrimination body; (b) taking legislative and practical measures against SLAPPs in line with the Council of Europe's recommendations adopted in April 2024; (c) issuing public statements in support of CSOs that are targeted by third parties; and (d) ensuring proper investigation of attacks against CSOs and activists within a reasonable timeframe; and
- The Ministry of Justice and the State Register Agency remove the fees obligation for updating the information of UBOs for non-profit organisations and provide possibilities for the automatic updating of the relevant data.

3.9 State Support

Overall score per area: **4.1/7**

Legislation: **4.3/7**

Practice: **3.9/7**

State funding for CSOs is allocated by several ministries, primarily supporting social, educational, cultural and sport projects. Although most of the funds from the state budget are distributed based on the respective governmental procedure that requires competitive and transparent grant mechanisms, the necessary information is not always publicised, while incidents of non-competitive allocations based on the pre-assigned budget funding or secrecy procedures raise concerns regarding fairness and transparency. At the local level, support remains largely discretionary, with limited transparency or accountability. In-kind assistance, such as providing space for CSO activities, is typically offered on an ad hoc basis.

The electronic platform of state procurements is used for submitting grant applications. However, CSOs report that the platform is complicated and contains technical issues. The new electronic platform for public procurements has not been launched yet.

CSOs enjoy tax exemptions for the goods, work and services provided by them free of charge, as well as for charitable projects. Charitable status is provided for eligible projects based on respective government decisions but requires a long and complicated procedure. There are no tax benefits for economic activities of CSOs and for individual donors, while corporate donor benefits are limited.

²⁹⁶ RA Law on State Duty, 27 December 1997, Article 16.

Volunteering is regulated by the 2023 Law on Volunteer Work, which provides protections and the possibility of certificates recognising volunteer experience. While volunteering is widespread, especially among youth, CSOs face administrative burdens in managing contracts and smaller organisations lack awareness and capacity to comply with the law.

The score in this area has not changed. It is recommended that the government expand and improve transparent state funding mechanisms for CSOs on both national and local levels, create a more favourable tax environment that supports diverse and sustainable funding sources and work with CSOs and international partners to resolve legislative and practical gaps in volunteering regulations.

Standard I: There are a number of different and effective mechanisms for financial and in-kind state support to CSOs.

According to the procedure for providing subsidies and grants to legal entities from the state budget, the organisation receiving such a grant is selected as a result of a competition, while the subsidy is allocated on the basis of a subsidy agreement between the state body and the organisation.²⁹⁷ The funding provided to CSOs is predominantly done in the format of grants for a one-year period based on the annual budget of the grant-giving body. According to the information from the SRC, 132 foundations and 288 public organisations reported that they were funded from the state or community budget in 2024.²⁹⁸ Based on the data from the Ministry of Finance, in 2024, 267 public organisations and foundations received funding from the state budget, equalling to about 13 billion AMD (around 29.6 million EUR) in total. The vast majority (about 70%) of funding was allocated to cultural, educational, social and youth activities in the framework of grant contracts administered by the Ministry of Education, Science, Culture and Sport and the Ministry of Labour and Social Affairs. The state funding was also allocated through procurement contracts (about 500 million AMD or 1.1 million EUR) to 12 public organisations and 22 foundations – most of them state-founded foundations or higher educational establishments. In most cases, these contracts were awarded through non-competitive procedures.²⁹⁹

Local governments can also allocate funding to CSOs through a separate budget line. Most often, municipalities provide funding to social and youth organisations, mostly in the format of monetary assistance to an organisation or its representatives. Based on the Law on Youth Policy, some municipalities planned allocating funds for youth projects in their budgets.³⁰⁰ The practice of outsourcing services to CSOs by local governments is still limited; however, there are a number of successful cases of CSOs managing to obtain funds or co-funding from the community budget for their social

²⁹⁷ RA Government Decision No. 1937-N “On approving the procedure for providing subsidies and grants to legal entities from the state budget of the Republic of Armenia”, 24 December 2003, last amended on 3 April 2025 (in Armenian), <https://www.arlis.am/hy/acts/205168>.

²⁹⁸ Information provided on 18 September 2025 by the State Revenue Committee in response to an inquiry by TIAC.

²⁹⁹ Based on data provided on 23 October 2025 by the Ministry of Finance in response to an inquiry by TIAC.

³⁰⁰ Focus-group discussions conducted in the framework of CSO Meter research, September 2025.

projects. In-kind support to CSOs at the local level is rare, mostly limited to the allocation of a space for community, daycare, or youth centres. CSOs also note that municipalities are usually open to providing space for one-time CSO events, such as trainings or meetings.³⁰¹

Standard II: State support for CSOs is governed by clear and objective criteria and allocated through a transparent and competitive procedure.

State support at the national level is provided on a competitive basis and is regulated through a detailed procedure and criteria. However, support from local budgets is discretionary and lacks accountability.

The procedure on providing state subsidies and grants to legal entities regulates the grant announcement process and the organisation of activities of the grant selection committee in detail, including provisions on conflict-of-interest issues, transparency in the selection process and setting the selection criteria. The engagement of CSO representatives in the selection committee is not mandated but is instead left to the discretion of the state body providing the grants. This procedure also specifies that grant competitions, contracting, and reporting should be conducted through an electronic system.³⁰²

Although the procedure on state subsidies and grants stipulates that the results of the competition, the protocol of the selection committee and other competition-related documents, as well as grant project reports, are published on the official website of the state body, the state bodies do not always provide timely and complete information as is required. For example, the Ministry of Labour and Social Affairs publishes the reports of all the CSOs that have received grant projects from this Ministry,³⁰³ and allocated a section on grant competition results on the Ministry's website, but there is no document uploaded in this section as of November 2025.³⁰⁴ The Ministry of Education, Science, Culture and Sport provides the documentation from the grant competition along with the grant contracts on their website but there are no CSO reports available.³⁰⁵ Furthermore, there are cases when the grants are provided without competition, for example based on the pre-allocated budget funding (mostly to sport organisations, CSOs representing national minorities and universities)³⁰⁶ or through secret

³⁰¹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

³⁰² RA Government Decision No. 1937-N "On approving the procedure for providing subsidies and grants to legal entities from the state budget of the Republic of Armenia", 24 December 2003.

³⁰³ Ministry of Labour and Social Affairs of the Republic of Armenia, "Reports (grant programs)" (in Armenian), <https://www.mlsa.am/reports/1274>.

³⁰⁴ Ministry of Labour and Social Affairs of the Republic of Armenia, "Reports (Minutes of the selection committee)" (in Armenian), <https://mlsa.am/reports/2963>.

³⁰⁵ Ministry of Education, Science, Culture and Sport of the Republic of Armenia, "Grant Programs" (in Armenian), <https://escs.am/am/category/grantsprograms>.

³⁰⁶ RA Government Decision No. 2323-N "On measures to ensure the implementation of the 2024 State Budget of the Republic of Armenia", 28 December 2023 (in Armenian), <https://www.arlis.am/hy/acts/202735>.

procedures without sufficient justification. A media publication in November 2025 revealed that, over the course of five years, the Prime Minister's Office had allocated around 207 million AMD (around 471,000 EUR) in grants through secret decisions to a research institute for studies on the political environment in the aftermath of the 2018 revolution and 2020 war, raising public concerns about favouritism and a lack of transparency.³⁰⁷

The Electronic Public Procurement System at www.armeps.am is used for submitting grant applications and for publishing information about grant contracts. The Ministry of Finance has published guidelines for system users and organisers of grant competitions on its website.³⁰⁸ The contracts are published in a non-machine-readable PDF format, while the search filters do not allow for easy identification of the CSOs that have received grant funding or procurement from the state budget, since all types of recipients are displayed under each type of procurement procedure (and the grant tenders are technically treated as a type of procurement procedure). Many CSOs interested in state grants find the application process through the electronic procurement platform complicated and burdensome, full of technical terminology and requirements that can only be practically dealt with by procurement specialists. Several CSOs mentioned technical issues with submissions of documentation which resulted in the disqualification of their proposals. At the same time, experienced organisations faced fewer issues.³⁰⁹ The Ministry of Finance has continued the development of a new electronic platform for public procurement that is expected to address technical shortcomings and improve transparency. The Ministry has consulted with CSOs on the options available for the design of the platform, but has not launched the platform as of November 2025.

Apart from technical issues in the process of grant allocation by the state, CSOs highlight excessive bureaucracy, an opaque selection processes and inadequate funding that does not match the scope of required activities. They note it is practically impossible to carry out the required scope without co-funding from the organisation or other donors. In some cases, ministries have reduced budgets after approving grant proposals but then still expected full implementation, with such changes often being negotiated verbally after the selection committee's decision. Issues linked with bureaucratic and procedural aspects were highlighted regarding the grants of the Ministry of Education, Science, Culture and Sport for establishing regional youth

³⁰⁷ Kirakosyan, Narek, "The head of the NGO which received 207 million drams from the budget, in 2019 wrote a book about Pashinyan's march and street movement", *Factor.am*, 31 October 2025 (in Armenian), <https://factor.am/947296.html>; OC Media, "Armenian government under scrutiny over secret grants to research institute", 5 November 2025, <https://oc-media.org/armenian-government-under-scrutiny-over-secret-grants-to-research-institute/>.

³⁰⁸ Ministry of Finance of the Republic of Armenia, "Guides, Manuals"(in Armenian), https://www.minfin.am/hy/page/uxecuyc_dzernark/.

³⁰⁹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

centres. Due to the delayed signing of contracts and subsequent payments, complex procurement stages and heavy administrative burdens, grantee organisations were unable to complete planned construction or renovation in the contract period and were fined.³¹⁰

There is no competitive mechanism for local level funding and the allocations from municipalities are mostly provided on a discretionary basis, based on the applications they receive. CSOs cite a lack of transparency in the process, as well as the lack of a mechanism for monitoring and a lack of accountability of the funded initiatives. In-kind support, such as the allocation of office spaces, is also carried out in a discretionary manner by local government and is based on the cooperation experience with CSOs and the requirement of community input in the state grant programs.³¹¹

Standard III: CSOs enjoy a favourable tax environment.

Overall, the tax legislation is generally not favourable to CSOs, although there are a few available benefits. According to the Tax Code, assets, works and services received gratuitously by non-profit organisations are not profit-taxed.³¹² At the same time, in-kind donations by businesses are taxed with VAT, with the tax calculation base accounting for 80 percent of the value of the donated assets.³¹³ The law provides VAT exemptions for the goods, works and/or services that are provided by public, charitable and religious organisations free of charge. VAT exemptions are also provided for subsidies, subventions or grant projects in cases where such projects are implemented within inter-government agreements or have preliminary approval from the relevant government commission that has an authority to qualify projects as charitable. These provisions are implemented effectively in practice.

CSOs are required to pay income tax for their staff on the same basis as private companies, as well as property tax if they own or rent office space. Following the drastic reduction of foreign support after the U.S. executive order, many organisations faced additional difficulties in meeting tax obligations. However, no tax holidays or other relief measures were introduced for those experiencing significant funding cuts.³¹⁴

There are no tax incentives for the economic activities of CSOs and organisations engaged in direct entrepreneurship are not eligible for the simplified tax regimes available to small businesses (see Area 2: Equal Treatment). In light of financial pressures, many CSOs are increasingly exploring economic activities as a means of self-

³¹⁰ Focus-group discussions conducted in the framework of CSO Meter research, September 2025.

³¹¹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

³¹² RA Tax Code, 4 October 2016, Article 108.

³¹³ *Id.*, Article 62.

³¹⁴ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

funding, but they face capacity constraints and unequal competition with private businesses.

Non-profit organisations are obliged to charge VAT on their goods and services in instances where their annual turnover (from all types of activities) exceeds 115 million AMD (around 261,800 EUR).³¹⁵ Starting in 2023, CSOs have engaged in dialogue with the government to raise their concerns regarding the treatment of grant income as subject to VAT and finding possible solutions. However, the solutions proposed by the government during the meetings did not yet resolve the possible risks (see Area 3: Access to Funding).

According to the Law on Charity, benefits such as tax exemptions, duties and mandatory payments are provided to charitable projects in the manner prescribed by law.³¹⁶ The Government Decision on Charitable Projects sets out the procedure for qualifying projects as “charitable”, as well as the relevant procedures for presenting applications, making decisions, overseeing charitable projects and revising the charitable qualification.³¹⁷ Charitable status is provided for specific projects throughout their duration, but can be revised in cases where issues are identified during the implementation, for example, where false information is identified in project documentation or where there are other legal infringements.³¹⁸ Where a project is given charitable status, the organisation has to provide an annual report on its activities to the authorised body.³¹⁹

The procedure for obtaining the status of a charitable project and the related tax exemptions is complicated and time-consuming, overburdened with technical and bureaucratic requirements and often takes more than a month to complete, which is particularly problematic in the case of emergency response projects. Furthermore, each procurement contract within a project recognised as charitable requires separate government approval to qualify for a tax exemption.³²⁰ In collaboration with international organisations, CSOs have engaged in dialogue with the government and

³¹⁵ RA Tax Code, 4 October 2016, Article 59.

³¹⁶ RA Law on Charity, 8 October 2002, last amended as of 14 November 2024, Article 16 (in Armenian), <https://www.arlis.am/hy/acts/199719>.

³¹⁷ RA Government Decision No. 66-N ‘On Charitable Projects’, 16 January 2003, last amended on 31 January 2019 (in Armenian), <https://www.arlis.am/hy/acts/128100>.

³¹⁸ The Procedure of Qualifying and Registering Charitable Projects, Appendix 1 to the RA Government Decision No. 66-N “On Charitable Projects”, 16 January 2003, Article 28.

³¹⁹ The authorised body that makes decisions and carries out other relevant functions as per the Procedure of Qualifying and Registering Charitable Projects is the Deputy Prime Minister’s Office, which should make the decision based on the recommendation of the Advisory Commission on the Coordination of Charitable Projects. See: RA Prime Minister’s Decree No. 1111-A “On Establishing the Charter and Composition of the Advisory Commission on Coordination of Charitable Projects and Revocation of the RA Prime Minister’s Decree No. 205 of 14 March 2001”, 21 August 2018, last amended on 19 May 2025 (in Armenian), <https://www.arlis.am/hy/acts/206991>.

³²⁰ Information check with a representative of ‘NGO Center’, September 2025.

the National Assembly to revise the current charity legislation to make it more efficient so as to enable greater charity activities and to stimulate philanthropy.³²¹

There is a growing trend in the CSOs' usage of crowdfunding platforms. However, the tax legislation creates additional challenges for intermediary organisations who provide the crowdfunding platforms. Specifically, these organisations must pay VAT on each donation, which reduces the funds for the beneficiary CSOs. As a solution, the intermediaries organise direct transfers of donations to beneficiary CSOs (through transit bank accounts) to ensure the money reaches the beneficiary in full.³²²

Standard IV: Businesses and individuals enjoy tax benefits for their donations to CSOs.

The tax benefits provided for donations are insufficient for stimulating large and frequent donations. The tax benefit provided for corporate donations is the following: assets, work or services provided to non-profit organisations are deducted from the taxable base of profit taxpayers, but not more than the amount of 0.25 percent of the gross income of the reporting year.³²³ As mentioned above, in-kind donations by companies are taxed with VAT (if there is no special governmental decision on VAT exemption), with the tax calculation base accounting for 80 percent of the value of the donated assets.³²⁴ In practice, there are a number of business entities that allocate funds to CSOs for social, educational, healthcare and environmental issues. However, they prefer not to apply for the tax deduction to avoid the associated time-consuming and complicated taxation procedures.³²⁵

Standard V: Legislation and policies stimulate volunteering.

The Law on Volunteer Work, which entered into force in October 2023, sets out the legal basis of volunteering and volunteer status, the judicial protection of the rights of volunteers, the right to reimbursement of additional expenses arising from volunteer work, health and safety guarantees and other provisions to ensure the protection of the rights of volunteers. There is no prohibition on the engagement of volunteers in the entrepreneurial activities of CSOs. The Law defines a “volunteer” as a person that has signed a volunteer work agreement with the organisation. In the case of voluntary work performed without an agreement, this work is considered illegal and the organisation

³²¹ NGO Center, “Dialogue4Progress: ‘Legal Regulation Mechanisms and Needs of the Charitable Sector: Why Regulate the Charitable Sector?’”, 18 September 2024, <https://ngoc.am/en/dialogue4progress-2/>; NGO Center, “Philanthropy Enabled: Driving Legal Reform for Charitable Action in Armenia”, <https://ngoc.am/en/programs/cso-meter-ngoc/>.

³²² Information check with ReArmenia Foundation, September 2025.

³²³ RA Tax Code, 4 October 2016, Article 123.

³²⁴ *Id.*, Article 62.

³²⁵ CIVITTA, “Assessment of Private Sector Funding Opportunities for Civil Society Organisations in Armenia”, Final Report, 2023, <https://www.counterpart.org/publication/assessment-of-private-sector-funding-opportunities-for-civil-society-organizations-in-armenia/>.

can be subject to fines. At the same time, the Law includes a definition of “one-time action” and indicates that signing a contract on voluntary work is not mandatory in cases of participation in a “one-time action”, as well as in cases when voluntary work is not performed through an organisation.³²⁶ Based on the Law, volunteers have the right to receive a certificate evidencing their experience, which can be further used to assist them in obtaining a job or a university place. For this purpose, the Ministry of Labour and Social Affairs adopted a procedure for providing a certificate that considers a period of voluntary work as work experience. Under this procedure, host organisations must enter volunteer information into the Ministry’s electronic job platform (e-work.am), after which an automated certificate can be generated and downloaded from the system.³²⁷

In practice, CSOs largely engage volunteers in their work and there is a widespread acknowledgment of volunteering as a concept, especially among Armenia’s youth population. Furthermore, volunteering experience is often acknowledged by employers and universities. Some universities require volunteer experience as a pre-condition for admission, which further popularises volunteerism and encourages young people to volunteer in CSOs.

CSOs note that the availability of the contract encourages the commitment of volunteers to comply with the relevant terms and work hours. However, CSOs also mention several difficulties that they face when signing a volunteer agreement, regardless of the length of the volunteer’s involvement, as this creates an administrative overload for organisations that manage hundreds of volunteers.³²⁸ Furthermore, the Law requires that the volunteer’s social security number be specified in the contract, which is not possible for international volunteers who are from outside of Armenia. CSOs note that many organisations lack the awareness and capacity to apply the Law on Volunteer Work, while smaller grassroots groups without accounting or legal specialists face particular challenges in preparing the required documentation.³²⁹ To address these gaps, a handbook on managing volunteer work was developed under an EU-funded project and several regional CSOs launched awareness-raising and capacity-building initiatives.³³⁰

³²⁶ RA Law on Volunteer Work, 14 June 2023 (in Armenian), <https://www.arlis.am/hy/acts/180260>.

³²⁷ RA Minister of Labour and Social Affairs Order No. 10-N “On defining the procedure for providing a certificate for considering a period of voluntary work as work experience”, 12 January 2024 (in Armenian), <https://www.arlis.am/hy/acts/188744>.

³²⁸ Focus group discussions conducted in the framework of CSO Meter research, September 2025.

³²⁹ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

³³⁰ Vahram Petrosyan, Stepan S'hoyan, “Guidebook on Managing Volunteer Work”, ProDeform LTD, STRIVE, Yerevan 2025 (in Armenian), <https://erit.am/storage/documents/pdf/fe01317c73b69201cd353b3339cdb05.pdf>.

Specific recommendations in this Area are as follows:

- The government: (a) enlarges the scope of funding to CSOs, including increasing the number of state authorities providing state funding and increasing grant funding and services that outsource the relevant amounts and practices; (b) ensures a transparent, competitive and accountable funding allocation at both the national and local levels, including through modernising the electronic platform for grants to ensure its smooth and effective use; and (c) adopts regulations to set clear and narrow criteria for non-competitive funding and mandates transparent and competitive allocations from local budgets;
- The government (particularly the Ministry of Finance) and the National Assembly create a more favourable tax environment to improve the possibilities for CSOs to seek funding and in-kind support from diverse sources, including individual and business donations and direct entrepreneurship activities. In particular, the government is recommended to:
 - simplify the procedures for charity tax exemptions to allow timely and efficient transactions for charitable purposes;
 - provide more beneficial taxation schemes for CSOs engaged in economic activities to encourage their efforts towards self-sustainability;
 - consider best international practices to stimulate CSO activities through more favourable taxation measures;
 - provide meaningful tax deductions for individual and business donations;³³¹ and
 - dismiss the VAT taxation requirement for in-kind donations to CSOs; and
- The government and the National Assembly engage in collaboration with CSOs and international organisations to address the existing legislative and practical issues related to volunteering regulations and endorse CSO-developed guidance and templates on volunteer management.

3.10 State-CSO Cooperation

Overall score per area: **4.0/7**

Legislation: **4.4/7**

Practice: **3.6/7**

³³¹ For example, in Poland, Bulgaria, and Czechia, corporate donations are tax deducted to up to 10 percent of the tax base, see: ECNL, “Tax Benefits Stimulating Philanthropy: Comparative Research”, May 2021, <https://ecnl.org/sites/default/files/2021-07/Final%20ECNL%20Tax%20benefits%20stimulating%20philanthropy%20July.pdf>.

Armenia has no overarching strategy for state-CSO cooperation, with engagement instead being guided by various laws and strategies that include participatory provisions. Recent reforms, such as the creation of the Department on Participatory and Open Government Issues under the Prime Minister's Office, have sought to strengthen the dialogue between the state and the civil society, while key strategies in areas such as anti-corruption, gender, youth and human rights also foresee CSO engagement.

Amendments to the Law on the Public Council led to the relaunch of this constitutional advisory body after years of inactivity, along with the initiation of the process to form a new Fact-Finding Commission under its structure. Additional platforms for cooperation include public councils attached to ministers and heads of other government bodies, thematic committees, monitoring groups and multi-stakeholder bodies linked to international initiatives such as the OGP and EITI. However, many ministerial and thematic councils remain inactive in practice, with weak accountability and limited accessibility for regional CSOs. A new regulation adopted in September 2025 seeks to improve the functioning of public councils by enhancing meeting regularity, regional representation and feedback mechanisms.

The overall score in the area of State-CSO Cooperation remained unchanged from 2024, while the Law score improved from 4.3 to 4.4 due to the new regulations on public councils and establishment of the new unit in the Prime Minister's Office. It is recommended that this unit works jointly with CSOs and international partners to strengthen the civil society environment and adopt a respective action plan. Further recommendations are addressed to government bodies urging full implementation of the new public council procedures with a transparent selection process and regular public reporting. Finally, a recommendation is addressed to the constitutional Public Council to ensure broad, inclusive CSO participation and to set up the emerging Fact-Finding Commission through transparent, merit-based and well-resourced processes.

Standard I: State policies facilitate cooperation with CSOs and promote their development.

State-CSO cooperation is not regulated by any policy or strategy in Armenia and there are no state strategies on CSO development which would assist more effective partnerships and joint efforts towards the growth of the CSO sector. The state-CSO cooperation framework is covered by several laws and strategies setting out participation opportunities for civil society. The Roadmap for the implementation of the Public Administration Reform Strategy in 2023-2025 and a results framework for the strategy contain provisions on the formation of an institutional mechanism for the monitoring and maintenance of participatory management procedures, advancing online and offline tools and mechanisms for participatory governance, and set indicators on improving public awareness on the reforms and input in policy-making.³³² In line with this vision, a Department on Participatory and Open Government Issues within the Prime Minister's Office was established by the Prime

³³² RA Government Decision No. 691-L "On approving the strategy of public administration reforms, the roadmap and result framework for 2022-2024, the list of persons providing monitoring and coordination of the strategy implementation", 13 May 2022.

Minister's Decree in December 2024.³³³ The department is tasked with developing and overseeing participatory governance methodologies, coordinating open government initiatives, implementing CSO development activities and enhancing cooperation with CSOs.³³⁴

Provisions on the collaboration with CSOs are included in the Anticorruption Strategy, the Strategy for the Implementation of Gender Policy, the National Strategy for Human Rights Protection and the Law on Youth Policy, as well as in legislation regulating the establishment and activities of multi-stakeholder committees and joint working groups. These documents were developed with CSO participation, with various levels of implementation and monitoring.

Standard II: The state has special mechanisms in place for supporting cooperation with CSOs.

The Constitution includes a provision on the establishment of a Public Council (also referred as a Public Chamber) as an advisory body to the government.³³⁵ The functions of this body include representing the interests of different sections of society in policy-making and policy implementation, facilitating the participation of civil society in public administration processes, and identifying public opinion on issues of public interest, including laws and other normative legal acts, state programmes, strategies, concepts and their drafts.³³⁶

The Law on the Public Council regulates the key principles of its operation and membership. The Public Council is composed of 45 members. Fifteen of them are appointed by the Government based on the Prime Minister's nomination. Upon appointment, these members elect another fifteen members (heads of Public Council committees) from the nominations presented by various entities, then the elected 30 members nominate and elect the remaining fifteen members. The candidacy for the Chairman of the Public Council is proposed by the Prime Minister and then approved at a government session.³³⁷ In December 2024, amendments to the Law on Public Council were adopted to amend the procedure of member selection and assign the fact-finding commission to within the Public Council. Based on the amendments, the process of organising the announcement for nominations, the collection of nominations and the voting logistics is carried out by the secretariat of the Public

³³³ RA Prime Minister's Decree No. 1204-L on Amendments to the Decree No. 564-L of the Prime Minister of the Republic of Armenia dated 25 May 2018, 26 December 2024.

³³⁴ Office of the Prime Minister of the Republic of Armenia, Department of Participatory and Open Governance Issues, Government of the Republic of Armenia (in Armenian), <https://www.gov.am/am/staff-structure/info/289/>.

³³⁵ Constitution of the Republic of Armenia, 5 July 1995, amended on 6 December 2015, Article 161.

³³⁶ RA Law on the Public Council, 7 March 2018, last amended as of 9 January 2025, Article 2 (in Armenian), <https://www.arlis.am/hy/acts/201686>.

³³⁷ *Id.*, Article 5.

Council, which has been functioning as a structural division under the Office of the Prime Minister.³³⁸

At the end of January 2025, the government appointed the aforementioned fifteen members of the Public Council based on the Prime Minister's nominations. Further, new members were elected as per the procedure defined by the law. The list of the nominations from various organisations has been published on the government's website (77 nominations in total), as well as the final list of the Public Council members.³³⁹ According to the statement by the Prime Minister, the Public Council is considered fully formed as of 10 April 2025.³⁴⁰ Since then, the Public Council has held several meetings and sessions and has shared related information on its Facebook page.³⁴¹ At the same time, most CSOs that were engaged in focus group discussions were not aware of the new composition and activities of the Public Council.

Based on the amendments to the Law on Public Council, the Fact-Finding Commission will be established within the Council to investigate fundamental and systemic human rights violations in Armenia from 21 September 1991 (i.e. from the establishment of the Republic of Armenia) up to 2023 inclusive. The Commission's mandate includes identifying causes and institutional failures and making recommendations for reforms to prevent future violations and foster social justice and reconciliation. The Commission shall operate under the principles of impartiality, political neutrality, public accountability and transparency, including through publicly accessible reports and proceedings.³⁴² In August 2025, the government adopted by-laws to define the procedures for the Commission's activities as well as for nominating the members of the Commission and regulating the process of document presentation and selection.³⁴³ Interviewed experts expressed doubts about the rationale for placing the Fact-Finding Commission under the Public Council, noting that it lacks the institutional credibility and professional capacity required for such a serious mandate. They also highlighted that the Commission's scope is too broad for a seven-member team to address its goals effectively within a limited timeframe.³⁴⁴ In October 2025, a competition was

³³⁸ RA Law on Amendments to the RA Law on Public Council, 4 December 2024 (in Armenian), <https://www.arlis.am/hy/acts/201682>.

³³⁹ Government of the Republic of Armenia, "Public Council nominations by commissions", https://www.gov.am/u_files/file/Haytararutyun-2025/njnlnlwlwnnlutp.pdf; Government of the Republic of Armenia, "Public Council members", 9 April 2025, https://www.gov.am/u_files/file/Haytararutyun-2025/3wljnwjhu%20hnphnlqn.pdf

³⁴⁰ Prime Minister of the Republic of Armenia, "Statement on the Formation of the Public Council", 10 April 2025, <https://www.gov.am/files/docs/5898.pdf>

³⁴¹ Public Council of RA, Facebook page, <https://www.facebook.com/profile.php?id=100069520519448>

³⁴² RA Law on Public Council, Article 11.1-11.7.

³⁴³ RA Government Decision No. 1143-L "On Defining the Procedure of the Activity of the Fact-Collection Commission", 14 August 2025 (in Armenian), <https://www.arlis.am/hy/acts/210680>; RA Government Decision No. 1128-L "On Defining the Procedure for the Submission of Nominations by Non-Profit Organisations for Election in the Fact-Collection Commission, the List of Documents to be Submitted, and the Procedure for their Submission and Study", 14 August 2025 (in Armenian), <https://www.arlis.am/hy/acts/210608>

³⁴⁴ Interviews conducted in the framework of CSO Meter research, August-September 2025.

announced to recruit members of the Fact-Finding Commission, but due to an insufficient number of applications, the competition was deemed unsuccessful.³⁴⁵

In order to ensure the participation of civil society in the implementation of the objectives and functions of the ministries, public councils adjunct to the ministers were set up by a 2016 government decision. Further, a clause pertaining to public councils was included in the new exemplary charter for public administration bodies in 2018.³⁴⁶ According to the standard rules of procedures, which were subsequently adapted by those ministries which established the councils, the councils shall be recruited through an open announcement in a transparent manner and shall meet at least on a quarterly basis. In practice, according to the information published on the official websites of the ministries, throughout 2025 (as of November 2025), the public councils convened only in four out of twelve ministries, with most of them failing to meet on a regular basis.³⁴⁷ Only one ministry provided a report on the annual activities of the council.³⁴⁸ Among other government bodies, the SRC was more active and convened three meetings of the Public Council on Revenue Administration Reforms, engaging CSOs and business entities.³⁴⁹ CSOs that were engaged in the active councils noted that this platform is useful for obtaining first-hand information on government programmes and policies and occasionally provides an opportunity to raise issues or give feedback at the early stages of the development of drafts. Nevertheless, there are no mechanisms to ensure that CSO recommendations are duly considered.³⁵⁰ A major challenge restricting the engagement of regional CSOs in the public councils is the difficulty of travelling to Yerevan, as it is not possible to join through online channels and no funding is provided to cover travel expenses.

In September 2025, the Prime Minister issued a decree introducing new regulations on public councils attached to ministers and heads of government-affiliated bodies. The draft decree had been discussed among civil society organisations and was published on the e-draft platform in July 2025.³⁵¹ Under the regulation, all draft strategies, concepts and programmes developed by the ministries and other bodies must be discussed with council members both at the initial concept stage and again after the

³⁴⁵ Public Council of RA, Facebook page *op. cit.*

³⁴⁶ RA Government Decision No. 1552-L "On Amendment to the Decision No. 624-L of the Government of the Republic of Armenia dated May 22, 2018", 27 December 2018.

³⁴⁷ See: Official websites of 12 ministries, listed on the website of the RA Government, <https://www.gov.am/en/structure/>.

³⁴⁸ Ministry of Education, Science, Culture, and Sport of the Republic of Armenia, "Report on the Activities of the public council adjacent to the Minister of Education, Science, Culture, and Sport for 2024" (in Armenian), <https://escs.am/files/files/2024-12-26/c436da771ac470a8929522d93ff09140.pdf>

³⁴⁹ State Revenue Committee of the Republic of Armenia, "Public Council on Revenue Administration Reforms" (in Armenian), <https://www.src.am/am/getMenusContents/2018>.

³⁵⁰ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

³⁵¹ "On approving the rules of procedure and formation procedure of the public councils of ministries of the Republic of Armenia" (draft), Unified Website for Publication of Draft Legal Acts (in Armenian), <https://www.e-draft.am/projects/8404>

development of the legal act before its official circulation. The procedure requires state bodies to ensure the possibility of remote participation in the sessions, establishes mechanisms for providing feedback to members' suggestions and for ongoing communication between the sessions and regulates the selection of council members. Non-governmental and non-commercial organisations which have: (a) operated in the relevant sector; (b) have at least three years' experience in the relevant activity in the past five years; and (c) have implemented at least two projects in the relevant area, are eligible. A 25% quota is set for regional organisations (based outside Yerevan). These regional organisations also have reduced requirements of two years' experience in the relevant activity. Additionally, individual experts with relevant backgrounds may be included. The composition of councils, their meeting minutes and annual activity reports must be published on the official websites of the respective government bodies.³⁵² The Prime Minister's decision sets a 90-day deadline for establishing public councils in line with the new procedure and a six-month deadline for adapting government websites to the relevant transparency requirements.

Other area-specific councils and committees were established by decision of the Prime Minister, or by ministries and other government agencies, including the Anti-Corruption Policy Council, the Council on Constitutional Reforms, the Council on Women's Affairs, the Council on Ethnic Minority Affairs and the Child Protection National Committee. The Human Rights Defender of Armenia has also established several consultative bodies. In addition, consultative bodies are created under regional and local government bodies. However, only some of these bodies meet regularly and many at both national and local levels remain largely inactive. CSOs particularly highlight the work of joint commissions involving CSOs and local social service departments, coordinated by the Ministry of Labour and Social Affairs, which operate more actively at the local level.³⁵³ Most of the consultative bodies, however, do not have transparent principles on member selection and operation. Equally, the relevant administrative bodies often do not publish any information about the meetings and decisions taken that would enable the monitoring of their activities.

Multi-stakeholder working groups have been set up within international initiatives to ensure the commitment to participatory practices within the framework of the OGP and the EITI,³⁵⁴ though these groups have met less frequently in recent years. Several joint working groups are formed on an ad hoc basis around specific legal drafts or the development and implementation of specific strategies, with some of them being

³⁵² RA Prime Minister's Decree No. 835-L "On approving the rules of procedure and formation procedure of the Public Council of Ministries of the Republic of Armenia", 22 September 2025.

³⁵³ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

³⁵⁴ See Open Government Partnership Armenia, "Group Members", <https://ogp.gov.am/en/about-the-group>; and Extractive Industries Transparency Initiative ("EITI") Armenia, "MSG Composition", <https://www.eiti.am/en/MSG-composition/>.

supported by donor-funded programs. For example, the Coordination Council of the Human Rights Protection Strategy 2023-2025 meets regularly with the support of an EU-funded project that is implemented by UN agencies.³⁵⁵

Several government-established monitoring groups provide public oversight in closed institutions and inform policy implementation. The Penitentiary Monitoring Group established by the Ministry of Justice conducts regular visits to penitentiary institutions,³⁵⁶ while the Ministry of Internal Affairs renewed the procedure and composition of the monitoring group overseeing the places of detention and organised training for its members.³⁵⁷ A similar monitoring group operates under the Ministry of Health to monitor institutions providing treatment and care services for people with mental health problems. The group overseeing care institutions under the Ministry of Labour and Social Affairs was dismissed in 2024 due to the absence of a respective legislative basis.³⁵⁸ In 2025, following amendments to the Law on Social Assistance,³⁵⁹ the Ministry of Labour and Social Affairs published for consultation a new draft order regulating the procedures of the monitoring group.³⁶⁰ According to member CSOs, monitoring groups serve as an effective oversight mechanism and offer a platform for state-CSO cooperation. However, these monitoring groups face challenges in securing funds for regular activities.³⁶¹

³⁵⁵ Interview conducted in the framework of CSO Meter research, September 2025; Ministry of Justice of the Republic of Armenia, Facebook post, 2 March 2025 (in Armenian), <https://www.facebook.com/mojofarmenia/posts/pfbid0p9pe4usS9ckoPcvdZ4KBzPHzFD1Ycm3AqNmATjuLYXCgZQNiCbrR2TCbGCVFN74fl>.

³⁵⁶ RA Minister of Justice Order No. 126-N, 20 March 2020, last amended on 11 May 2022 (in Armenian), <https://www.arlis.am/hy/acts/162767>; Prison Monitoring Group, Facebook page, <https://www.facebook.com/prisonmonitoring/>.

³⁵⁷ RA Minister of Internal Affairs Order No. 15-N “On defining the composition of the group of public observers implementing public oversight in places of detention and in the center for temporary placement of asylum applicants, operating under the police system of the Ministry of Internal Affairs of the Republic of Armenia, and the procedure for implementing public oversight”, 30 October 2024 (in Armenian), <https://www.arlis.am/hy/acts/200054>; Ministry of Internal Affairs of the Republic of Armenia, “Effective cooperation, experience exchange: training of observation groups in places of detention took place”, 17 September 2025 (in Armenian) <https://mia.gov.am/2025/09/17/dzpy-3/>.

³⁵⁸ Disability Rights Agenda, “Joint statement on the termination of the activity of the observation group in care institutions”, 31 May 2024 (in Armenian), <https://dra.am/hy/articles/announcement/joint-announcement-on-the-termination-of-the-monitoring-group-in-care-institutions>.

³⁵⁹ RA Law on Social Assistance, 24 October 2024 (in Armenian), <https://www.arlis.am/hy/acts/199657>.

³⁶⁰ RA Minister of Labour and Social Affairs Order “On defining the procedure and conditions of implementing public monitoring in organisations providing all-day care, requirements for public organisations, as well as the scope powers of the public monitoring group” (draft), Unified Website for Publication of Draft Legal Acts (in Armenian), <https://www.e-draft.am/projects/9126/about>.

³⁶¹ Interviews and information checks with members of public monitoring groups conducted in the framework of CSO Meter research, September 2025.

Specific recommendations in this Area are as follows:

- The new government unit on Participatory and Open Governance implements measures aimed at improving the enabling environment for civil society by setting up a respective action plan and working jointly with government bodies, CSOs and international organisations;
- State bodies fully utilise the potential of consultative bodies and working groups and effectively implement the new procedure on public councils, ensuring transparent selection and operations, particularly through the regular publication of information in a dedicated section of their official websites and social media accounts; and
- The newly formed Public Council ensures better outreach and greater inclusion of the broader CSO community in its activities, while the emerging Fact-Finding Commission is selected through a transparent, accountable and merit-based procedure and is equipped with adequate powers, resources and professional capacity to operate effectively and credibly.

3.11 Digital Rights

Overall score per area: **4.4/7**

Legislation: **4.8/7**

Practice: **4.0/7**

The protection of digital rights is embedded in constitutional provisions and regulations covering the freedom of expression, the right to privacy, the freedom of information and other relevant legislation. In 2025, the government approved and submitted to the National Assembly a new package of draft laws on Cybersecurity, Public Information and the Regulatory Body of Information Systems. These reforms aim to: (a) strengthen cybersecurity; (b) establish clear responsibilities for state bodies and service providers; and (c) create an independent authority to oversee information systems. While widely consulted, CSOs note that implementation will need ongoing adjustments to the law as challenges emerge in practice.

In current legislation, the use of technology for surveillance purposes is regulated in detail and is restricted for a narrow set of purposes. However, the enforcement is weak, and oversight is limited, leaving risks of abuse and unlawful monitoring. Amendments to the Law on Police expanded police access to surveillance cameras. While these amendments incorporated some safeguards for police, they also granted municipalities access to surveillance without any clear regulation. CSOs, journalists and activists continue to face spyware, phishing and DDoS attacks, with reports of increasing activity by hacker groups linked to Russia. These all serve to underscore the vital need for stronger digital security practices.

Several digital platforms have been established to facilitate access to government-held information, provide participation opportunities, and allow the possibility of submitting electronic enquiries and complaints. Access to digital services has

expanded under the government's Digitalisation Strategy and Action Plan for 2021-2025, with platforms such as YES EM and Hartak.am providing online identification and e-services. Social media companies freely operate in Armenia and Internet access is generally affordable and widespread. Fact-checking and media literacy initiatives led by CSOs, often in partnership with the government, play an important role in countering disinformation and strengthening digital resilience, though awareness raised by the government remains limited.

The overall score for the area of Digital Rights has declined from 4.5 in 2024 to 4.4 in 2025 due to a decrease in the Law score from 4.9 to 4.8. The need to strengthen cybersecurity and provide protection against unlawful spyware might be addressed once the legislative framework and by-laws on cybersecurity are adopted. Furthermore, it is recommended that the legal provisions on police surveillance are revised so that they align with the applicable international standards and ensure robust safeguards. Finally, it is recommended to guarantee that law enforcement would use surveillance technologies lawfully while conducting transparent and effective investigations into any alleged abuses.

Standard I: Digital rights are protected and digital technologies are compliant with human rights standards.

The legislation lacks the concept of digital rights but assumes several related obligations based on international conventions and relevant human rights-related laws. Armenia has ratified the Convention on Cybercrime, which sets out certain responsibilities of the state related to the protection of rights in cyberspace.³⁶² The protection mechanisms in the national legislation are covered in the constitutional provisions, laws and regulations on inter alia the freedom of expression, the freedom of information, the right to privacy, personal data protection and cybercrime. The Constitution envisages principles of proportionality and certainty which would be applicable to all restrictions on fundamental rights and freedoms and allows the restriction of specific rights and freedoms under a state of emergency or martial law.³⁶³

There is no specific regulation on artificial intelligence (AI). The Criminal Code establishes liability for cyber offences in accordance with the principles declared in the Convention on Cybercrime. As mentioned in Area 6 (Freedom of Expression) above, public speech aimed at inciting or promoting hatred, discrimination, intolerance or enmity (as well as distributing materials or objects for that purpose), public calls to and the public justification or preaching of violence (including in online platforms) are also subject to criminal liability. The Criminal Code also includes the list of cybercrimes in line with emerging issues (e.g. the violation of copyright and related rights, child pornography and hate speech through the use of information or communication technologies; computer network penetration and changing data; data phishing or theft;

³⁶² The Council of Europe, "The Budapest Convention (ETS No. 185) and its Protocols", <https://www.coe.int/en/web/cybercrime/the-budapest-convention>.

³⁶³ RA Constitution, 5 July 1995, amended on 6 December 2015, Articles 76-79.

computer fraud; and others).³⁶⁴ In May 2025, the National Assembly adopted the Law on Cryptoassets to regulate and reduce systemic risks in the cryptoasset market.³⁶⁵

Following the OGP commitment on data policy development, the government prepared a draft package of new laws on Cybersecurity, Public Information and the Regulatory Body of Information Systems, along with amendments in the respective legislation. Specifically, aiming to ensure cybersecurity in information systems and in key information infrastructures providing vital services, the draft Law on Cybersecurity: (a) sets out key rules for service providers; (b) defines response measures for different scenarios including emergencies; (c) establishes a framework of roles and responsibilities for state bodies in coordination with a national Computer Emergency Response Team (CERT); (d) identifies areas of vital importance; and (e) introduces compliance requirements which are to be verified through cybersecurity audits.³⁶⁶ The draft Law on the Regulatory Body of Information Systems establishes an independent commission which is responsible for information systems and cybersecurity, and defines the scope of its powers. The commission will be responsible for managing government information systems, developing and coordinating security measures to ensure a safe digital environment, providing advisory opinions on draft legislation related to information systems and cybersecurity, as well as for contributing to the development of relevant governmental policies. Based on the recommendations by CSOs, the draft also explicitly includes a declarative provision on cooperation with civil society organisations alongside other stakeholders within its mandate.³⁶⁷ After several revisions and discussions with the stakeholders,³⁶⁸ the draft package was approved by the government in August 2025 and passed the first reading in the National Assembly in October 2025.³⁶⁹

The Law on Personal Data Protection provides relevant regulations on the use and processing of personal data. The right to freedom and the secrecy of correspondence, telephone conversations and other means of communication is guaranteed by the Constitution. Restrictions on this right can be provided only by law for the purposes of state security, the economic welfare of the country, preventing or disclosing crimes, protecting public order, health and morals, or protecting the basic rights and freedoms of others. The secrecy of communication may be restricted only by court decision,

³⁶⁴ RA Criminal Code, 5 May 2021, Chapter 38, Articles 359-365.

³⁶⁵ RA Law on Cryptoassets, 29 May 2025 (in Armenian), <https://www.arlis.am/hy/acts/208599>.

³⁶⁶ RA Law on Cybersecurity, first reading, National Assembly of the Republic of Armenia.

³⁶⁷ RA Law on the Regulatory Body of Information Systems, first reading, National Assembly of the Republic of Armenia.

³⁶⁸ See more information at: CSO Meter, "Armenia takes next steps to improve management of public information and cybersecurity in digital public services", 22 September 2025, *op. cit.*

³⁶⁹ The legislative package was fully adopted by the parliament on 4 December 2025, after the CSO Meter 2025 reporting period.

except where it is necessary for the protection of state security and is conditioned by the particular status of communicators prescribed by law.³⁷⁰

According to the Law on Operational Intelligence, the surveillance of electronic communications can be carried out only by a court decision, except for urgent cases when a delay may lead to actions of terrorism or threaten state security. In these cases, the NSS can carry out surveillance within the 48-hour period prior to a court decision being secured.³⁷¹ The Criminal Procedure Code also states that the interference with a person's correspondence, telephone conversations and other forms of communication during proceedings can be carried out solely via a court decision.³⁷² However, if there is evidence suggesting that a person has committed an alleged crime, investigators can request the details of this person's electronic communications with the approval of the supervising prosecutor.³⁷³ At the same time, there is a lack of clear and detailed procedures for the storage and destruction of materials obtained as a result of surveillance and no mechanisms are established for independent and effective external control (including public oversight) of the operation of the surveillance system.³⁷⁴ These issues have become particularly evident in recent cases of leaked wiretaps and video recordings circulated in the media, which generated significant public concern and were later used as grounds for bringing criminal proceedings (see more in Area 7: Right to Privacy).

The use of digital technologies by law enforcement bodies is covered by the regulations on using technical means for operational intelligence. These regulations contain safeguards against the violation of the right to privacy. Furthermore, a government decision authorises the development of technical tools, including both software and hardware, that are specifically designed to capture information in computer systems and computer networks and to intercept all forms of electronic communication, including text, voice and multimedia content.³⁷⁵ The Law on Electronic Communications obliges all telecommunications operators to provide law enforcement and national security representatives with access to communication equipment and similar devices in accordance with the relevant legal provisions and procedure to support them in the implementation of operational intelligence.³⁷⁶ However, the Law does not impose any obligation on the bodies implementing the operational intelligence activities to present the authorising court decision to telecommunications

³⁷⁰ RA Constitution, 5 July 1995, amended on 6 December 2015, Article 33.

³⁷¹ RA Law on Operational Intelligence, 22 October 2007, Articles 32 and 34.

³⁷² RA Criminal Procedure Code, 30 June 2021, last amended as of 1 August 2025, Article 26 (in Armenian), <https://www.arlis.am/hy/acts/209973>.

³⁷³ *Id.*, Article 232.

³⁷⁴ Law Development and Protection Foundation, "Analysis of the judgements of the European Court of Human Rights finding violation of the Article 8 of ECHR", *op. cit.*

³⁷⁵ RA Government Decision No. 810-N "On setting list of special technical means for conducting operational intelligence", 31 July 2008 (in Armenian), <https://www.arlis.am/hy/acts/45845>.

³⁷⁶ RA Law on Electronic Communications, 8 July 2005, last amended as of 1 August 2025, Article 50 (in Armenian), <https://www.arlis.am/hy/acts/209934>.

operators in advance (or post factum in urgent cases), which allows for a high risk of abuse of powers and unauthorised interference with the communications of individuals.³⁷⁷

In March 2025, the National Assembly adopted amendments to the Law on Police, granting the Ministry of Internal Affairs access to cameras installed on the exterior of state and municipal buildings, airports, border checkpoints and public parking areas, as well as in public transportation, and obtain video records from these locations.³⁷⁸ The law authorises the identification of individuals in cases where there is “*reasonable suspicion of a crime or an administrative offence*”, and includes several safeguards to ensure the transparent and accountable use of surveillance systems, such as electronic logging, timestamping, use by designated personnel and liability for any breaches of the procedure. During parliamentary readings, a new provision was added allowing municipalities to access the police’s surveillance systems in their communities, which lacks clear legal safeguards and did not pass any prior expert discussions. Experts have emphasised the need for close monitoring to ensure installed cameras are in line with the required procedures and are used only for clear and specific purposes. Besides, experts have warned that local governments lack technical capacities and respective regulations and safeguards to manage such surveillance responsibility (see also Area 7: Right to Privacy).³⁷⁹

In practice, some CSO representatives note that they cannot exclude the possibility of unlawful surveillance by law enforcement or the NSS.³⁸⁰ In recent years, civil society representatives and journalists are targeted by spyware, phishing campaigns and DDoS attacks, which aim to steal sensitive information, disrupt operations and exploit limited cybersecurity capacities. According to a report by Media Diversity Institute, hacker groups affiliated with Russia are increasingly involved in targeting Armenia’s digital infrastructure.³⁸¹ For example, in April 2025, dozens of CSOs received a spear phishing message via Signal messenger, appearing to come from the head of the EU Delegation to Armenia and containing a malicious link disguised as a Microsoft Teams meeting link; the IP addresses were traced to a cloud provider located in Russia.³⁸² Another phishing attack followed in May 2025, using a PDF attachment disguised as an

³⁷⁷ Law Development and Protection Foundation, “Analysis of the judgements of the European Court of Human Rights finding violation of the Article 8 of ECHR”, *op. cit.*

³⁷⁸ Amendments to the RA Law on Police, 5 March 2025.

³⁷⁹ Interviews conducted in the framework of CSO Meter research, August-September 2025.

³⁸⁰ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

³⁸¹ Media Diversity Institute, CyberHUB, “Armenia Country Threat Landscape Report 2024”, 2025, https://mdi.am/wp-content/uploads/2025/06/Armenia_Threat_Landscape_2024_ENG.pdf.

³⁸² *Ibid.*

official document and redirecting the recipient to a malicious page.³⁸³ Such attacks underscore the urgent need for stronger digital security practices among CSOs.

Social media platforms operate freely in Armenia. Meta cooperates with state authorities in combatting cyberattacks and, in cases of serious crime, provides data to uncover fraud if the authorities prove that all other means have been exhausted. Based on this procedure, in the period of July-December 2024, thirteen such requests were received by Armenian authorities, ten of which were related to legal proceedings.³⁸⁴

There are no specific national regulations enabling citizens to seek the government's protection in cases of rights violations on social media. In April 2025, a draft package on amendments to Civil Code was published for public consultation, introducing liability for defamatory or insulting content posted by individuals on online platforms and allowing claimants to request the removal of such content (see more under Area 6: Freedom of Expression).³⁸⁵

According to the Freedom on the Net 2025 report by Freedom House, Armenia's score declined from 74 in 2024 to 72 in 2025. The country is assessed as "free" in terms of internet freedom with limited website blocking and few content removal orders. However, several issues were highlighted in the report, including detentions for online criticism of the government and surveillance of citizens by commercial spyware products.³⁸⁶

Standard II: The state creates conditions for the enjoyment of digital rights.

The legal framework for the enjoyment of digital rights is covered by various relevant laws. Armenia's Digitalisation Strategy and Action Plan for 2021-2025 envisages a number of measures for the digital transformation of the government, the economy and society, including: (a) the introduction and development of innovative technologies, cybersecurity, data policy, e-services and e-government systems; (b) the coordination of digitalisation processes; (c) the creation of common standards and a digital environment; (d) the implementation of initiatives promoting the use of digital technologies in the private sector and by the public; and (e) ensuring better protection of personal data and intellectual property.³⁸⁷ In 2025, the Ministry of High Tech Industry published a report on the implementation of the Digitalisation Strategy and Action Plan and provided information on the activities that were implemented in 2024

³⁸³ CyberHub, "Targeted Phishing Attack on Armenian NGO", 29 May 2025, <https://cyberhub.am/en/blog/2025/05/29/case-study-targeted-phishing-attack-on-armenian-ngo/>.

³⁸⁴ Meta, Government Requests for User Data: Armenia, <https://transparency.meta.com/reports/government-data-requests/country/AM/>

³⁸⁵ Draft Laws "On amendments and additions to the Civil Code" and "On amendments and additions to the Law on Mass Media", *op. cit.*

³⁸⁶ Freedom House, "Freedom on the Net 2025: Armenia", <https://freedomhouse.org/country/armenia/freedom-net/2025>.

³⁸⁷ RA Government Decision No. 183-L "On approval of Armenia's digitalisation strategy, its activities programme and results indicators", 11 February 2021 (in Armenian), <https://www.arlis.am/hy/acts/149957>.

with the engagement of stakeholders working in respective areas.³⁸⁸ Among the activities that were implemented, the Ministry of High Tech Industry reported that an AI Virtual Institute platform had been established which is designed to connect researchers, students and professionals to support AI research, education and innovation while, at the same time, promoting the ethical and transparent use of the technology.³⁸⁹

There are several digital platforms in Armenia which facilitate access to government-held information, provide participation opportunities and allow for the possibility of submitting electronic complaints. These platforms include: e-register.am, which provides information on the registration process and registered entities, as well as the ability to register online (for business entities only); e-gov.am, which provides information on government decisions, reports, registers, etc.; arlis.am, a database of all legal acts; and e-petition.am, for submitting and joining public petitions. A national identification platform “YES EM”, launched by the government in 2024, enables citizens to access a growing range of state services online after completing a secure identification process.³⁹⁰ Another newly introduced platform for state services is Hartak.am, which was developed to streamline the delivery of national services in an automated format.³⁹¹ In contrast to previous years, identification-based platforms (e.g. e-petition, e-request, “YES EM”) now allow the use of mobile ID instead of a physical ID card with an electronic card reader. This change has made platforms more accessible to a growing number of citizens who have obtained ID cards to meet the universal income declaration requirement that was fully introduced in 2025.³⁹² However, experts and CSOs stress the need for a unified e-government system to compile the current patchwork of diverse platforms and increase public awareness. While the digitalisation of state services is expected to reduce bureaucracy, experts also warn of risks related to fraud and misuse of personal data.³⁹³

The internet is widely accessible and affordable in Armenia, particularly for mobile users, as the vast majority (99.5 percent) of settlements have mobile internet access, while broadband (fixed) internet is provided in 75.3 percent of settlements (as at the end

³⁸⁸ Ministry of High-Tech Industry of Republic of Armenia, “Digitalisation strategy progress report”(in Armenian), <https://hightech.gov.am/hy/tegekatvakan-kentron/financial/reports/5102025313>.

³⁸⁹ AI Virtual Institute, <https://ai.gov.am/en/about-the-project.html>.

³⁹⁰ National Identification Platform (in Armenian), <https://nid.e-gov.am/>.

³⁹¹ National Platform of Services (in Armenian), <https://hartak.am/>.

³⁹² State Revenue Committee of the Republic of Armenia, “Key information on universal declaration of income by individuals”, 11 October 2023, <https://src.am/en/getNews/216>.

³⁹³ Interviews and focus group discussions conducted in the framework of CSO Meter research, August-September 2025.

of 2024). This is a slight increase from the 72.4 percent reported in the previous year, with a 7 percent increase in the optical-fibre cable internet access.³⁹⁴

Armenian legislation does not regulate the principle of net neutrality, although the national authority, the Public Services Regulatory Commission, has made several announcements to confirm that technological neutrality is an important principle of regulation.³⁹⁵ According to the Resolution of the Commission, telecom operators and service providers must publish and inform their subscribers if they do not support certain protocols or prioritise specific traffic. The Resolution also enshrines that tariffs for services and conditions should be fully accessible to the public and should exclude any discriminatory or discretionary approach to their provision.³⁹⁶ In practice, however, some telecommunication companies offer their customers free access to selected streaming and messaging services, creating an uneven competitive environment that disadvantages Armenian developers.³⁹⁷

The legislation allows for the protection of violated rights either in an offline or online environment through the filing of a lawsuit, complaint or application to the court, law enforcement body, supervising body of the respondent, or specialised institutions such as the PDPA or the Office of the Human Rights Defender. According to the Law on the Protection of Personal Data, if anyone considers that their personal data has been processed in violation of the legal requirements or of their rights and freedoms, they can appeal to the PDPA or to the court and request compensation for damages.³⁹⁸

A number of fact-checking initiatives have been implemented by CSOs to minimise the spread of false news and to raise public awareness on the practices of identifying disinformation.³⁹⁹ CivilNet, an Armenian news organisation, has joined Meta's third-party fact-checking programme and currently implements fact-checking of Armenian-language content on Facebook and Instagram.⁴⁰⁰ Although Meta announced the winding-up of its fact checking program starting with the U.S.,⁴⁰¹ CivilNet stated it will continue with the fact-checking initiative as long as the contract with Meta is valid until

³⁹⁴ The Public Services Regulatory Commission of the Republic of Armenia, "Analytical statement on the activities to provide fixed connection penetration in the settlements of the Republic of Armenia", 2025 (in Armenian), <https://www.psrc.am/uploads/files/Էլեկտրոնային%20հաղորդակցություն/Ցանցերի%20հասանելիություն/Hasaneliutyun1.pdf>.

³⁹⁵ David Sandukhchyan, "Understanding digital rights and their importance in the information society", *Media Diversity Institute*, Yerevan 2021, https://mdi.am/wp-content/uploads/2020/10/research_on_digital_rights_in_Armenia.pdf.

³⁹⁶ Resolution of Public Services Regulatory Commission No. 471-N "On approval of the procedure of publication of tariffs and terms for data transmission and internet access services", 3 September 2008, last amended on 25 July 2012 (in Armenian), <https://www.arlis.am/hy/acts/77489>.

³⁹⁷ Interview conducted in the framework of CSO Meter research, August 2025.

³⁹⁸ RA Law on the Protection of Personal Data, 18 May 2015, Article 17.

³⁹⁹ See, for example, Fact Investigation Platform ("FIP"), Union of Informed Citizens, <https://fip.am/en/>; Media.am, "Verified", <https://media.am/hy/category/verified/>; InFact Facebook group by Investigative Journalists NGO, <https://www.facebook.com/groups/pastatsi/>; CivilNet, CivilNetCheck, <https://www.civilnet.am/civilnetcheck/>.

⁴⁰⁰ CivilNet, CivilNetCheck, *op. cit.*

⁴⁰¹ Meta, "More Speech and Fewer Mistakes", 7 January 2025 <https://about.fb.com/news/2025/01/meta-more-speech-fewer-mistakes/>.

January 2026.⁴⁰² Moreover, CivilNetCheck has become the first Armenian member of the European Fact-Checking Standards Network, which unites leading European fact-checking organisations.⁴⁰³ In March 2025, another platform FIP.am (the Fact Investigation Platform) established by the Union of Informed Citizens NGO became a member of the International Fact-Checking Network.⁴⁰⁴

CSOs also continue digital rights education and media literacy initiatives to address the current gaps in digital awareness and media literacy, which is especially important in the context of widespread disinformation. The Ministry of Education, Science, Culture and Sports actively collaborates with CSOs to promote media literacy and regularly organises schoolteacher training to facilitate the instruction of “*Digital Literacy and Computer Science*” in schools. The Media Initiatives Center established a Media Literacy Advisory Group which is aimed at coordinating government and civil society efforts in developing media education and enhancing the effectiveness of media literacy initiatives in Armenia.⁴⁰⁵ The Media Initiatives Center also set up an online media literacy course, which is promoted among the public servants by the government and, together with the government, organises an annual Media Literacy Week with the aim of drawing greater attention to understanding, analysing and using media literately and effectively.⁴⁰⁶ Other CSOs also implement local and national-level programs supported by the government and donors that are aimed at improving media literacy among the youth and the larger population.⁴⁰⁷ However, there is still a need for more awareness-raising activities in this area on the part of the government, particularly through public media.⁴⁰⁸

Specific recommendations in this Area are as follows:

- The government: (a) introduces the necessary by-law regulations for the Law on Cybersecurity to ensure its effective implementation; (b) strengthens the protections against cyber threats; and (c) prevents the use of unlawful spyware;

⁴⁰² Tigranuhi Martirosyan, “Meta’s Fact-Checking Program To Continue In Armenia For Now” *Media.am*, 13 January 2025, updated 16 January 2025, <https://media.am/en/newsroom/2025/01/13/41484/>.

⁴⁰³ CivilNetCheck, “CivilNet fact-checking unit first Armenian member of European fact-checking network” *CivilNet*, 24 February 2025, <https://www.civilnet.am/en/news/819015/civilnet-fact-checking-unit-first-armenian-member-of-european-fact-checking-network/>.

⁴⁰⁴ IFCN Code of Principles, “Fact Investigation Platform (FIP.am)”, [https://ifcncodeofprinciples.poynter.org/profile/fact-investigation-platform-\(fip.am\)-](https://ifcncodeofprinciples.poynter.org/profile/fact-investigation-platform-(fip.am)-).

⁴⁰⁵ Public Relations and Information Center. “Report on the implementation of the ‘Action Plan for the Concept of Combating Disinformation for 2024-2026’ in 2024”. 16 January 2025, *op. cit.*

⁴⁰⁶ Media Initiatives Center, “Online Media Literacy Course” (in Armenian), <https://elearning.media.am/course-category/ԱՆԴՊՊՈՒՄՆԵՐԸ/>; Media Initiatives Center, “Media Literacy Week in Armenia 2025” (in Armenian), <https://mediainitiatives.am/ml-week-2025/>.

⁴⁰⁷ Focus group discussions conducted in the framework of CSO Meter research, September 2025.

⁴⁰⁸ For more information about issues of disinformation and media literacy in Armenia, see: Mariam Khalatyan, Nvard Margaryan, “Disinformation in Armenia: Examining Public Perceptions”, *Socioscope*, Yerevan 2024, https://socioscope.am/wp-content/uploads/2025/01/Research_30.12_2024_Eng_20.01.25.pdf.

- The Ministry of Internal Affairs and National Assembly revise the new regulations on surveillance under the Law on Police to align them with international standards, ensuring a narrowly defined scope of lawful purposes and effective safeguards for accountability and the lawful use of surveillance by all authorised bodies (see also Area 7: Right to Privacy); and
- Law enforcement ensures the lawful usage of surveillance technologies in line with the requirements set by the Law on Personal Data Protection and the Law on Police and conducts transparent and effective investigations into any alleged cases of illegal surveillance.

IV. KEY PRIORITIES

In 2025, Armenia's CSO environment was shaped by both progress in some legislative reforms and persistent practical challenges. On the positive side, new regulations on public councils and strategic management procedures introduced clearer frameworks for CSO participation in policymaking, which created opportunities for more structured dialogue and engagement in early stages in line with CSO Meter's recommendations. Legal reforms in the areas of cybersecurity and information systems, along with plans for the expansion of the standing of CSOs in courts, as well as the establishment of an independent agency for personal data protection are also underway, with the potential to address pressing issues in these areas and align legislation with current local and global challenges. Furthermore, the government has commenced reforms aimed at ensuring the proportionate and lawful policing of assemblies and ensuring the proportionate and lawful use of force. However, the practical implications and the implementation of CSO Meter recommendations in this area remain to be seen.

At the same time, problems of financial sustainability have worsened, as issues related to access to funding and limited state support mechanisms remain unaddressed following the significant reduction of donor support after the cessation of U.S. foreign aid. Negative trends were also observed in the area of the freedom of expression, which continued to be strained by political polarisation, the harassment of journalists and criminal cases. Privacy breaches and recurring leaks of wiretaps, combined with expanded police access to surveillance tools and weak public oversight, heightened concerns over state intrusion into private life. Participation in decision-making remained uneven; although formal platforms expanded, implementation gaps and selective engagement persisted.

In light of this, the following seven recommendations out of total number of 38 recommendations in 11 areas have been identified as key priorities:

1. The Ministry of Finance provides a definition of “grant” in accordance with the best international practices and following consultation with CSOs and does not treat grant projects or other non-profit activities as economic activities;
2. The government (particularly the Ministry of Finance) and the National Assembly create a more favourable tax environment to improve the possibilities for CSOs to seek funding and in-kind support from diverse sources, including individual and business donations and direct entrepreneurship activities;

3. The National Assembly establishes mechanisms for mandatory public consultations on draft legislation produced by members of the National Assembly and for CSO engagement in both the early stages of legal drafts and during the final revisions of the drafts received by the government (including through engagement at the level of Standing Committees);
4. State bodies utilise and expand the pre-existing and new institutional mechanisms of participation to ensure meaningful participation, including through: (a) engaging CSOs in the early stages of policy development; (b) addressing the drawbacks of the e-draft platform and providing statistics on participation activities and the incorporation of comments on this platform; (c) providing sufficient time for consultations and organising more frequent face-to-face consultations, including in the regions; and (d) considering and incorporating well-founded and evidence-based suggestions to the maximum possible extent;
5. The government and public officials uphold freedom of expression standards, promote a culture of open and respectful public dialogue, and ensure responsible communication toward the media, refraining from intolerance towards diverse or critical opinions as well as from statements that may incite hostility or undermine public trust in journalists and media;
6. The government introduces stronger safeguards against unlawful surveillance and breaches of privacy, ensuring independent oversight and transparent investigations of violations; and
7. The state provides adequate protection for CSOs, including through: (a) adopting anti-discrimination laws and establishing an anti-discrimination body; (b) taking legislative and practical measures against SLAPPs in line with the Council of Europe's recommendations adopted in April 2024; (c) issuing public statements in support of CSOs that are targeted by third parties; and (d) ensuring proper investigation of attacks against CSOs and activists within a reasonable timeframe.

V. METHODOLOGY

The CSO Meter supports regular and consistent qualitative and quantitative monitoring of the environment in which CSOs operate in the Eastern Partnership (EaP) countries. It consists of a set of standards and indicators in 11 different areas to measure both law and practice. It is based on international standards and best practices. The CSO Meter was developed by a core group of experts from ECNL and local partners from the six EaP countries.

The country partners, together with other CSOs that are part of the CSO Meter Hub, conducted the monitoring process and drafted the narrative country reports. They also established Advisory Boards in each country, composed of expert representatives of key local stakeholders. The members of the boards have two main tasks: (1) to review the narrative reports; and (2) to assign scores for every standard based on the narrative reports.

This country report covers the period of January-November 2025.

The Monitoring Process

The monitoring process in Armenia has been conducted through qualitative methods, including desk research, interviews and focus group discussions. The desk research covered relevant legislation, available reports in the area, media and CSO publications, and state responses to enquires. CSO Meter Hub members were consulted through the report writing process. Fifteen interviews with experts, government and CSO representatives and additional data checks with eighteen CSOs and state representatives have been carried out.

Four in-person and two online focus group discussions were conducted with the participation of 57 CSOs from Yerevan and all regions of Armenia that are engaged in social, educational, youth, environmental, human rights, capacity-building, community development activities and other areas of activity. The opinions presented by the experts and CSOs who participated in the research are not fully representative and cannot cover all the challenges and achievements of the relevant CSO environment. However, the issues presented by the monitoring participants reflect the major developments in the CSO environment in Armenia, which are complemented by the findings from various reports and analyses.

The draft country narrative report was reviewed by the Advisory Board members in Armenia via online communication and at the in-person meeting held in October 2025.

Based on the recommendations of the Advisory Board members, the findings and recommendations were further revised and finalised.

The Scoring Process

The country researchers and ten Advisory Board members in Armenia assessed the **Standards in the eleven areas of the CSO Meter tool in Legislation and Practice which noted significant changes as compared to the previous year's report**. For the scoring procedure, a seven-point scale is used. The final score of each standard was then calculated according to a formula in which the researchers' score is worth 50 percent, and the Advisory Board members' average score is worth 50 percent. The score of each area is then calculated as the average value of the final scores of each standard, which is then calculated and rounded to one decimal point for presentational purposes.

The extreme values of the scale are conceived as the extreme/ideal situation or environment. For example, (1) is an extremely unfavourable (i.e. an authoritarian) environment for civil society, while (7) is an extremely favourable (i.e. an ideal democratic) environment for CSOs. For more information on the CSO Meter tool, the scoring process and the calculations used please visit: <https://csometer.info/>.

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